

OFFICE OF THE GOVERNOR
STATE OF MONTANA

STEVE BULLOCK
GOVERNOR



JOHN WALSH
LT. GOVERNOR

December 2, 2013

Shaun McGrath
Regional Administrator
United States Environmental Protection Agency
Region VIII, 8P-AR
1595 Wynkoop St
Denver, CO 80202-1129

RE: Montana 2012 Revised Annual PM_{2.5} NAAQS Initial Designations

Dear Mr. McGrath:

The U.S. Environmental Protection Agency (EPA) promulgated revisions to the National Ambient Air Quality Standards (NAAQS) for particulate matter smaller than 2.5 microns (PM_{2.5}) on December 14, 2012 (78 FR 3086). 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 December 14, 2013.

Montana hereby designates all 56 counties in the state "unclassifiable" or "attainment" for the 2012 revised annual PM_{2.5} NAAQS. The information provided in the enclosed Technical Support Document outlines Montana's rationale for these designations. If 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.

Sincerely,

A handwritten signature in black ink, appearing to be "S Bullock", written over a horizontal line.

Steve Bullock
GOVERNOR

Enclosure

cc: Director Tracy Stone Manning, Department of Environmental Quality
David Klemp, Chief, Air Resources Management Bureau
M. Eric Merchant, Air Resources Management Bureau

**RECORD OF MONTANA
STATE IMPLEMENTATION PLAN
CERTIFICATION**

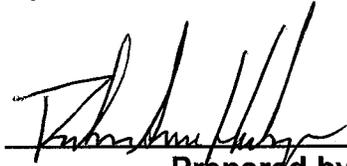
SIP REQUIREMENTS FOR PM_{2.5}

RECORD

State Implementation Plan Notice and Comment Process

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- (1) Public notice statement
- (2) Proof of notice to interested parties (list attached)
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- (6) DEQ response to public comments



Prepared by

Dec. 12, 2013
Date

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

**INITIAL STATE-WIDE AREA DESIGNATIONS FOR THE 2012 REVISED
PM_{2.5} NAAQS**

- 1) The Department of Environmental Quality (Department) is inviting public comment on the submittal of initial state-wide area designations for the December 14, 2012 revised national ambient air quality standards (NAAQS) for PM_{2.5} air pollution into the Montana State Implementation Plan (SIP).
- 2) According to 42 USC §7407, Congress directs states to submit an initial 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 NAAQS.
- 3) The Department will be accepting public comment regarding the proposal to include the initial PM_{2.5} NAAQS area designations into the SIP.
- 4) Any person may request public hearing on this matter. If the Department receives a request for public hearing, a public hearing on this matter will be scheduled and the time for that hearing will be announced. Additionally, another 30-day time period for submitting comment will begin at that time.
- 5) Interested persons may view the rules on the Department’s website at: [\[http://deq.mt.gov/pubcom.mcpv\]](http://deq.mt.gov/pubcom.mcpv) or may call the Department at 406-444-1457 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 Eric Merchant at P.O. Box 200901, Helena, Montana 59620-0901; phone 406-444-1457; by fax at 406-444-1499; or email emerchant@mt.gov.
- 7) Interested parties may submit their written comments to the Department concerning the proposal described above by:
 - mailing them to Eric Merchant at the above address;
 - faxing them to the attention of Eric Merchant at 406-444-1499; or sending them to Eric Merchant via email addressed to emerchant@mt.gov.

To be guaranteed consideration, written comments must be postmarked on or before 5 p.m. October 7, 2013.

Harbage, Rebecca

From: Barta, Oline <obarta@mt.gov>
Sent: Thursday, September 05, 2013 1:13 PM
To: Clean Air Act Advisory Committee (CAAAC)
Subject: MT DEQ Request for Public Comment

DATE: September 5, 2013

TO: Air Interested Parties

FROM: Montana Dept. of Environmental Quality - Air Resources Management Bureau

RE: Request for Public Comment on SIP Certification

The Department of Environmental Quality (Department) is inviting public comment on the submittal of initial state-wide area designations for the December 14, 2012 revised national ambient air quality standards (NAAQS) for PM_{2.5} air pollution into the Montana State Implementation Plan (SIP).

Montana must submit to EPA an initial list of geographic areas that attain the standard or that do not attain the standard or that are otherwise unclassifiable based on available information. Montana hereby designates all areas (Counties) within the state as "attainment" or "unclassifiable" for the 2012 revised primary annual PM_{2.5} NAAQS. Any person may request a public hearing on the matter. If a public hearing is not requested, written comments must be received on or before 5 p.m. October 7, 2013.

Interested parties may view the notice at <http://deq.mt.gov/pubcom.mcpX> or may obtain a copy of the notice by calling the Department at 406-444-1457.

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Site/Subject	Comment Period Ends	Document Location	Send Comments To
Public Notice for Initial State-Wide Area Designations For The 2012 Revised PM2.5 National Ambient Air Quality Standards (NAAQS) Montana's initial area designations for the revised NAAQS for PM2.5	October 7, 2013	Montana Department of Environmental Quality 1520 E. 6th Avenue P.O. Box 200901 Helena, MT 59620	Comments can be sent to: Eric Merchant MT-DEQ/ARMB PO Box 200901 Helena, MT 59620-0901 Phone: (406) 444-1457

TECHNICAL SUPPORT DOCUMENT
Montana Initial Designations
2012 Revised Annual PM_{2.5} National Ambient Air Quality Standards

I. EXECUTIVE SUMMARY

On December 14, 2012, EPA revised the national ambient air quality standards (NAAQS) for Particulate Matter smaller than 2.5 microns (PM_{2.5}), revising the annual primary (health-based) standard from 15 micrograms per cubic meter (µg/m³) to 12 µg/m³ expressed as the 3-year average of the annual mean concentrations. The primary 24-hour PM_{2.5} NAAQS has been retained and not revised; therefore, Montana's initial statewide designations address only the revised annual PM_{2.5} NAAQS. The revision was published in the Federal Register (FR) on January 15, 2013 at 78 FR 3086.

According to 42 USC §7407, *et seq.*, Montana must submit to EPA an initial list of geographic areas that attain the standard or that do not attain the standard or that are otherwise unclassifiable based on available information. Montana hereby designates all areas (Counties) within the state as "attainment" or "unclassifiable" for the 2012 revised primary annual PM_{2.5} 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 6 Montana counties with active PM_{2.5} State or Local Air Monitoring Stations (SLAMS) located within their respective boundaries for the design value period of 2010 through 2012. Available monitoring data collected at the SLAMS supports a conclusion that ambient concentrations of PM_{2.5} in those counties is in compliance and therefore attains the 2012 revised annual PM_{2.5} NAAQS.

Those counties to be designated "attainment" include: Silver-Bow, Missoula, Lewis and Clark, Lincoln, Powder River and Ravalli.

The remaining 50 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

Statewide, Montana operates 13 SLAMS and 5 Special Purpose Monitors (SPM). Figure 1 below shows the location of all PM_{2.5} monitors in the state. State or Local Air Monitoring Stations use only Federal Reference Methods (FRM) or Federal Equivalent Methods (FEM) and therefore provide data suitable for NAAQS compliance comparisons. Special Purpose Monitors do not necessarily use FRM or FEM monitoring methods and are primarily used for research purposes and therefore produce non-regulatory data unsuitable for NAAQS compliance comparisons.

Figure 1, Location of all PM_{2.5} Monitors within Montana



Table 1 below provides monitoring site designations (SLAMS, SPM) and monitor locations within their respective county for all PM_{2.5} monitors within the state. Table 1 includes SLAMS meeting data completeness requirements for the design value period of 2010-2012, SLAMS not meeting data completeness requirements for the design value period of 2010-2012 and SPMs.

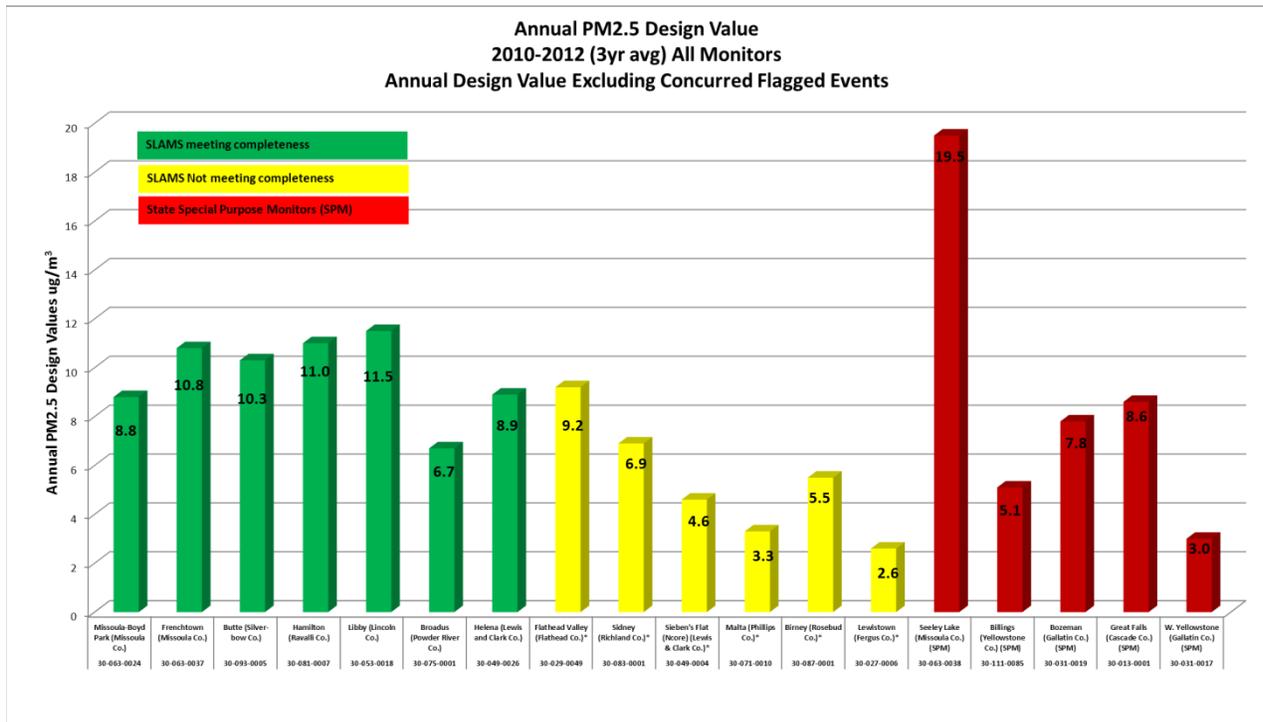
Table 1, Montana's PM_{2.5} Monitoring Network

Montana PM _{2.5} Monitoring Network					
State & Local Air Monitoring Stations				State Special Purpose Monitors (SPM)	
Meeting Data Completeness Requirements		Not Meeting Data Completeness Requirements		Data not flagged for Exceptional Events	
Site	Location	Site	Location	Site	Location
30-063-0024	Missoula-Boyd Park (Missoula Co.)	30-029-0049	Flathead Valley (Flathead Co.)*	30-063-0038	Seeley Lake (Missoula Co.) (SPM)
30-063-0037	Frenchtown (Missoula Co.)	30-083-0001	Sidney (Richland Co.)*	30-111-0085	Billings (Yellowstone Co.) (SPM)
30-093-0005	Butte (Silver-bow Co.)	30-049-0004	Sieben's Flat (Ncore) (Lewis & Clark Co.)*	30-031-0019	Bozeman (Gallatin Co.) (SPM)
30-081-0007	Hamilton (Ravali Co.)	30-071-0010	Malta (Phillips Co.)*	30-013-0001	Great Falls (Cascade Co.) (SPM)
30-053-0018	Libby (Lincoln Co.)	30-087-0001	Birney (Rosebud Co.)*	30-031-0017	W. Yellowstone (Gallatin Co.) (SPM)
30-075-0001	Broadus (Powder River Co.)	30-027-0006	Lewistown (Fergus Co.)*		
30-049-0026	Helena (Lewis and Clark Co.)				

Montana is regularly impacted by smoke from wildfires both within and outside of the state. When ambient air monitoring data is impacted by wildfires, states flag these data as “exceptional events” thereby removing the subject data from consideration in design value calculations to be used for NAAQS compliance comparisons. Flagged data may be excluded from the design value calculation assuming the event is “not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the EPA in accordance with 40 CFR 50.14 to be an exceptional event.” In some cases, the data represented in this document, and used to calculate design values, includes “exceptional events” that have been flagged as wildfire impacted data.

Figure 2 below shows the calculated design values for all 18 monitors in the state for the design value period of 2010-2012, excluding only flagged SLAMS data with EPA concurrence.

Figure 2, Annual PM_{2.5} 3-Year Average of Annual Mean at All Monitors



Based on the values represented in Figure 2 above, it should be noted that DEQ operates a non-FEM SPM at Seeley Lake Elementary School. This SPM was initially sited, installed and operated as part of Montana’s “Today’s Air” PM_{2.5} network which is designed to provide the citizens of Montana with near-real-time PM_{2.5} concentrations in geographically strategic locations state-wide. In response to the high PM_{2.5} values monitored at this SPM site the state of Montana, in cooperation with the Missoula City-County Health Department (MCCHD), conducted a wintertime study of the area using E-BAMs to determine the geographic extent of the problem. Based on the results of this study it has been determined that PM_{2.5} concentrations measured at the Seeley Lake Elementary School SPM site are representative of neighborhood scale impacts, and not the overall Seeley Lake airshed.

In response to this neighborhood scale issue, the MCCHD has initiated an episodic control program (PM_{2.5} Alerts) as well as a substantial and on-going subsidized process to replace aging and inefficient wood-burning devices in the Seeley Lake area. The effectiveness of this ongoing effort will continue to be monitored at the Seeley Lake Elementary School SPM site.

Figure 3 below removes all non-regulatory data obtained from SPMs and shows data from all SLAMS in the state. All data from SLAMS monitors shown in Figure 3 demonstrates compliance with the 2012 revised annual PM_{2.5} NAAQS. However, as discussed previously, several of Montana’s SLAMS did not meet data completeness requirements for the design value period of 2010-2012. Due to a lack of data completeness for the design value period of 2010-2012, these SLAMS should not be used to designate the areas as attainment; however, they do support a designation of unclassifiable.

Figure 3, Annual PM_{2.5} Design Values for All SLAMS

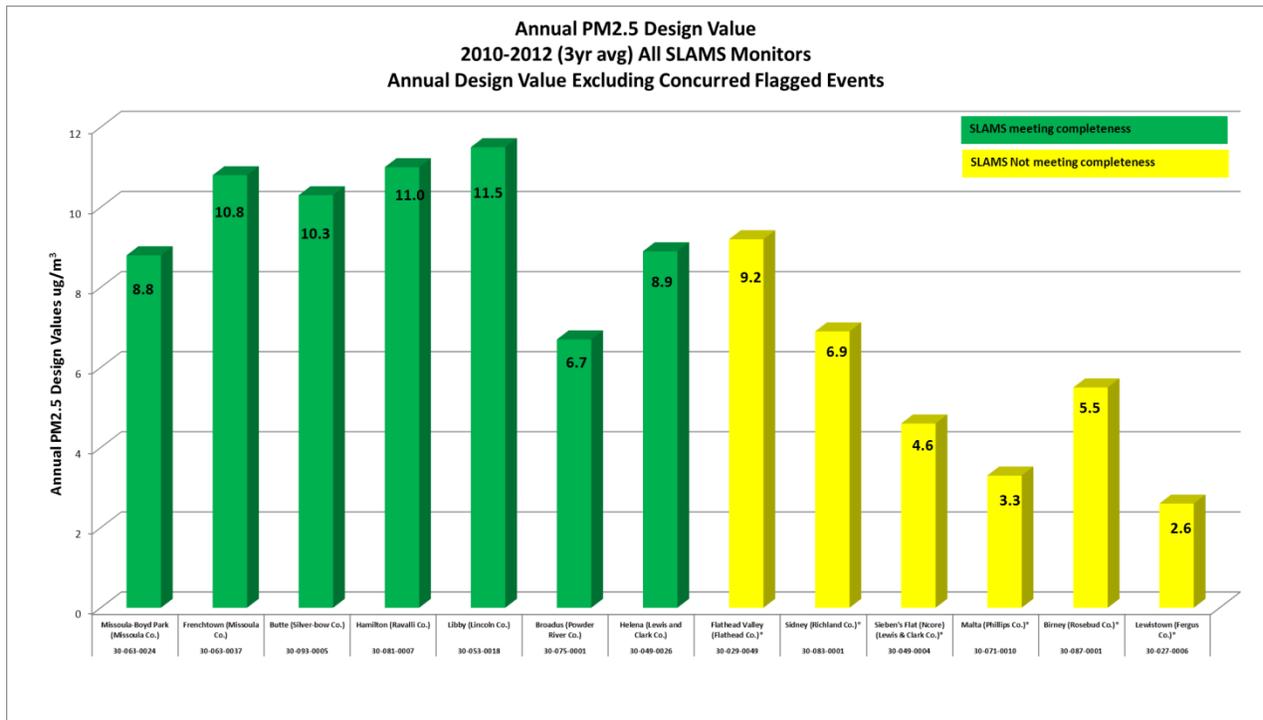


Figure 4 below removes all data from SLAMS which did not meet data completeness requirements during one or more years during the design value period of 2010-2012. The data shown in Figure 4 demonstrates compliance with the 2012 revised annual PM_{2.5} NAAQS.

Figure 4, Annual PM_{2.5} Design Values for All SLAMS Meeting Data Completeness Requirements

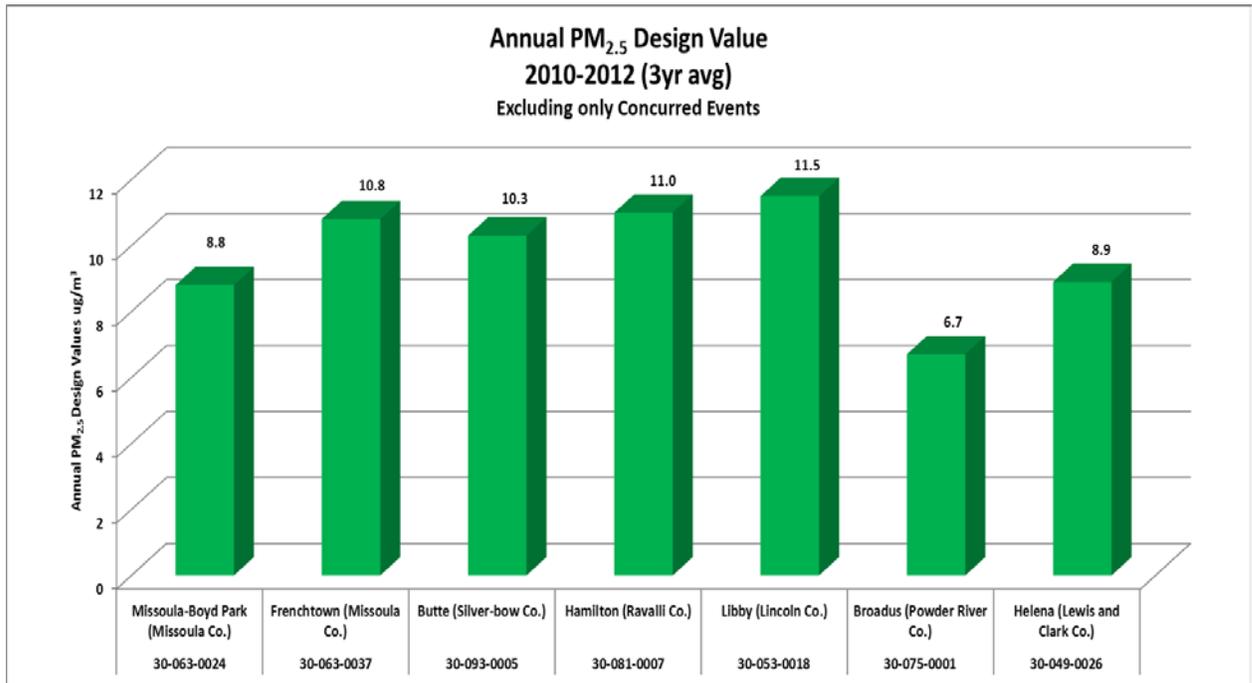
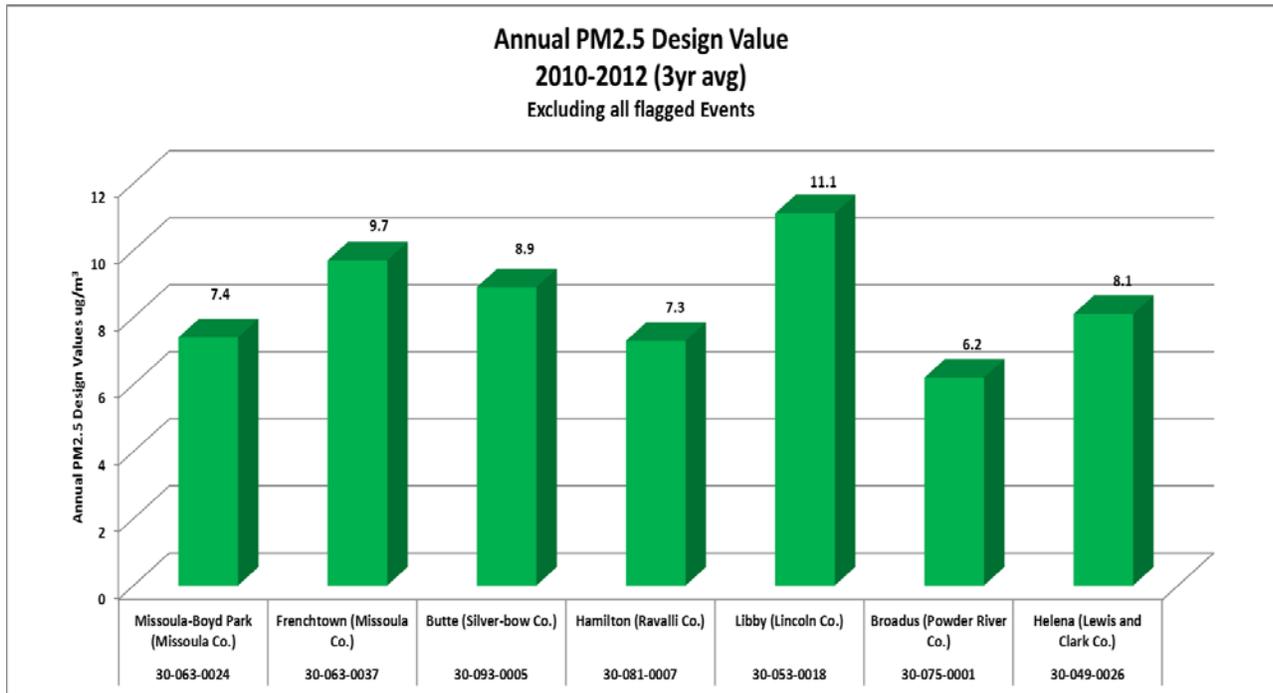


Figure 5 below represents the available complete SLAMS ambient monitoring data set for the design value period of 2010-2012 excluding all flagged data. As shown in the figure all SLAMS meeting data completeness requirements for the 2010-2012 design value period demonstrate compliance with the 2012 revised annual PM_{2.5} NAAQS of 12 ug/m³.

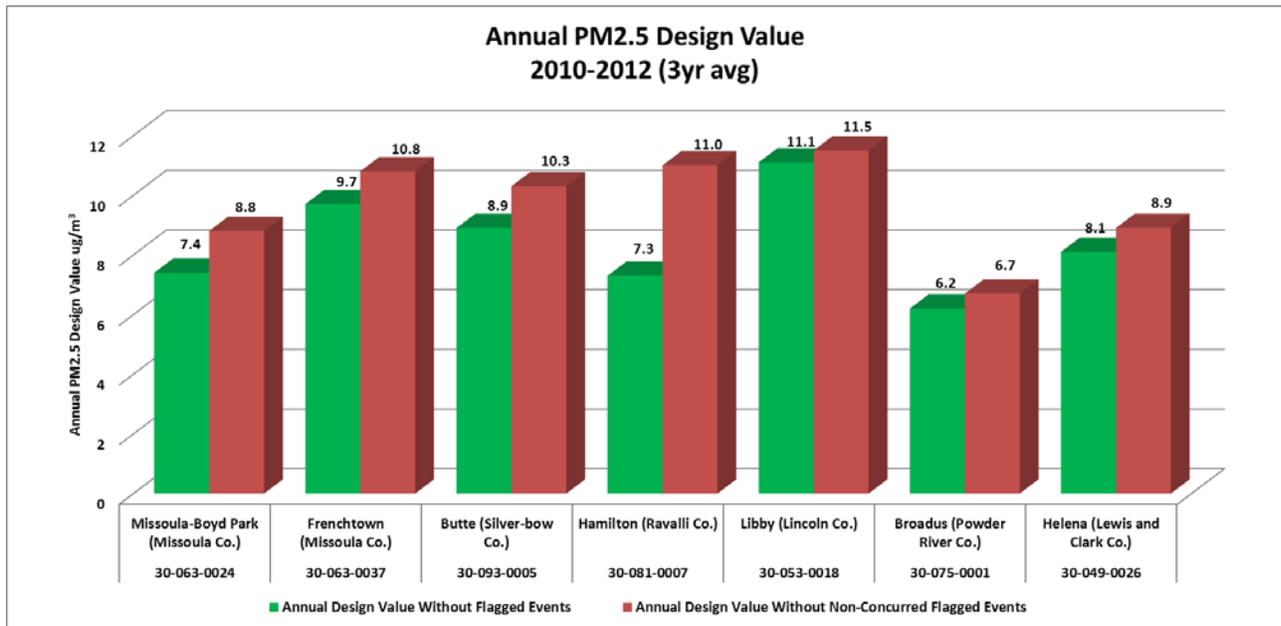
Figure 5 – Annual PM_{2.5} Design Values Excluding Flagged Data



Montana has appropriately flagged all monitoring data impacted by qualifying “exceptional events” through calendar year 2012. However, Montana only recently submitted a demonstration package providing justification for calendar year 2010 flagged data and to date has not submitted a demonstration for flagged data in calendar years 2011 and 2012. Therefore, EPA has not had an opportunity to concur with all of the affected data for the design value period of 2010-2012.

Figure 6 below represents a comparison of the data presented in Figure 5 (design values excluding all flagged events) with data including all exceptional events without EPA concurrence. Figure 6 demonstrates that inclusion of all flagged data (non-concurred) increases design values but not to a level exceeding the 2012 revised annual PM_{2.5} NAAQS.

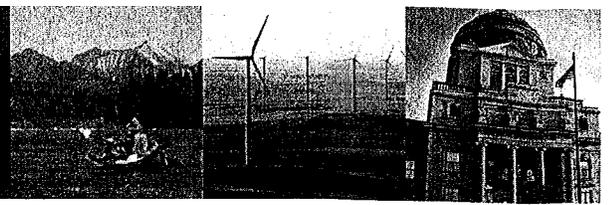
Figure 6 – Annual PM_{2.5} Design Value comparison with and without flagged data.



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 PM_{2.5} ambient air quality monitoring network the state of Montana has presented a strong case supporting the initial designations listed below.

Based on available information, as presented throughout this document, Montana determined that an initial designation of “attainment” is appropriate for the following counties: Silver-Bow, Missoula, Lewis and Clark, Lincoln, Powder River and Ravalli. The remaining 50 Montana counties should initially be designated as “attainment” or “unclassifiable” for the 2012 revised annual PM_{2.5} NAAQS.



**Clean & Healthful.
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Oct. 7, 2013

Eric Merchant
MT-DEQ/ARMB
PO Box 200901
Helena, MT 59601-0901

Dear Eric:

The Montana Environmental Information Center (MEIC) appreciates the documents provided by you and your staff last week regarding PM2.5 monitoring data in Montana. Although we have not had sufficient time to fully analyze the documents in the detail they deserve, we are now submitting comments on the Department of Environmental Quality's proposed initial statewide designations for the 2012 Revised PM2.5 National Ambient Air Quality Standard (NAAQS). We are concerned that the Department's proposed designations will allow some areas of the state to avoid decreasing harmful ambient concentration levels of PM2.5.

Our primary concern is regarding what appears to be a failure by regulatory agencies to address the unhealthy and extraordinarily high concentrations of PM2.5 in the Seeley Lake area. It is unconscionable that school children, the most vulnerable population in terms of air pollution, are placed at risk year after year because the county and state have not prioritized placing an adequate, enforceable monitor at the site. It appears as if this is a calculated move to avoid listing the area as nonattainment, and beginning to undertake the admittedly difficult task of addressing the problem and decreasing PM2.5 levels in the area.

Year after year, this site has recorded some of the highest PM2.5 concentrations in Montana. The reason provided to avoid listing the Seeley Lake area as nonattainment is that the monitor is non-federal equivalent method (non-FEM). This excuse falls far short of the department's duty to protect public health. Once the Department and County started receiving high PM2.5 readings at the Seeley Lake monitor, they should have replaced the non-FEM with a monitor that would provide actionable data. The certified monitor in Frenchtown can and should be exchanged with the monitor in Seeley Lake. The Frenchtown monitor routinely shows ambient concentrations below the standard. The Missoula Valley has two federally compliant monitors, yet the Seeley Lake area (where pollution levels are the highest) has none. As we stated in our June 28, 2013 comments on the Department's proposed Monitoring Network Plan, this problem needs to be corrected:

I. AN UPGRADE OF THE SEELEY LAKE PM2.5 MONITORING SITE IS NECESSARY

MEIC urges DEQ to ensure that Seeley Lake complies with the National Ambient Air Quality Standard ("NAAQS") for PM2.5. DEQ currently monitors PM2.5 at Seeley Lake "for public information only." Draft Plan at 14. However, due to the high concentration of PM2.5 at that station, particularly in the winter months, this monitoring must be upgraded to a Federal Equivalent Method monitor that is certified to produce NAAQS-comparison data, to ensure compliance with the NAAQS and to enable DEQ to determine whether it must take steps to reduce ambient particulate levels to protect the public in the Seeley area from the health impacts of this harmful pollutant.

It is now time for Missoula County and the Department to take the problem in Seeley Lake seriously and replace

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the monitor with one that provides enforceable data. The Department's argument that "the concentrations measured ... are representative of neighborhood scale impacts," ignores the fact that many people live in that "neighborhood" and the school children and neighbors deserve to breathe healthy air, just like every other Montana "neighborhood." Even if it were acceptable to sacrifice the lungs of Seeley Lake school children, the Department failed to provide any definition of "neighborhood," nor any documentation to support its claim that the impacts are extremely localized.

Most PM2.5 exceedances in Montana are due to winter inversions in mountain valleys. By the Department's reasoning, all of these mountain valleys are only experiencing neighborhood scale exceedances. This excuse ignores the very real impacts these high levels of PM2.5 are having in the area.

Other Areas Show High Levels And Should Not be Listed as Attainment

Department data indicate that other areas in the state have experienced high 3-year averages of the annual mean concentrations of PM2.5. We do not support listing these areas as attainment as they have violated the health standard in recent years and it is too early to conclude that they will not violate the standard in the near future without remediation efforts.

Specifically, the 005 monitor at Greely School in Silver Bow County has violated the 3-year average from 2008-2010, from 2009-2011, and is already close to violating the standard for the years 2011-2013. Pollution levels at this school site are not improving. They remain consistently high and place children's lungs at risk. Designating Silver Bow County as attainment with the standard is premature based upon previous 3-year annual average violations.

The same pattern exists in the Helena area at monitor 0026. The Helena area violated the standard from 2009-2011. The measurements in 2008-2010 and 2010-2012 show averages that are barely below the standard. The air quality in the Helena area is not improving, it is consistently just above or just below the standard. Remedial measures are necessary to decrease the average so that public health is not at risk. Listing Helena as attainment is premature.

Thank you for the opportunity to comment.

Sincerely,

Anne Hedges
Program Director



November 8, 2013

Anne Hedges
Program Director
Montana Environmental Information Center
P.O. Box 1184
Helena, MT 59624

RE: Response to Comments Concerning Montana's Initial Area Designations for the 2012 Revised Annual PM_{2.5} NAAQS

Dear Ms. Hedges:

As you are aware, on December 14, 2012, the Environmental Protection Agency (EPA) promulgated final revisions to the National Ambient Air Quality Standards (NAAQS) for fine particulate matter (PM_{2.5}) by lowering the annual form of the NAAQS from a level of 15 micrograms per cubic meter (ug/m³) to 12 ug/m³. The short-term (24-hour) form of the NAAQS was not revised. Within one year of promulgation of a new or revised NAAQS, and after reasonable notice and opportunity for public hearing, Montana must submit to EPA a list of all areas (or portions thereof) in the state designating as nonattainment, attainment, or unclassifiable. On September 5, 2013, the Department of Environmental Quality (DEQ) issued 30-day public notice for proposed initial area designations of "attainment" or "attainment or unclassifiable" for all 56 Montana Counties.

DEQ received comments from the Montana Environmental Information Center (MEIC) regarding Montana's proposed initial statewide PM_{2.5} area designations. MEIC cited concern stating that Montana's proposed designations will allow some areas of the state, which are currently at-risk of violating the PM_{2.5} NAAQS, to avoid implementing programs to mitigate ambient PM_{2.5} impacts in the affected areas. Specifically, MEIC cited Missoula County (Seeley Lake), Lewis and Clark County (Helena), and Silver Bow County (Butte) as areas of concern.

We value your comments and agree that these areas are of concern and at risk of violating the NAAQS. We also appreciate this opportunity to provide you with more information about DEQ's ongoing and collaborative efforts to proactively address potential public health issues associated with elevated PM_{2.5} in the affected areas without the need for a regulatory hammer provided under a nonattainment designation.

Generally speaking, the mountain valleys of western Montana and associated cities/towns are at risk of frequently accumulating high ambient levels of PM_{2.5} due to a combination of emission sources, geography, and meteorological conditions that trap potentially harmful emissions low in the atmosphere resulting in increased public exposure. Various studies conducted by DEQ in collaboration with local/City-County health Departments point to smoke from prescribed open burning, wildfires, and residential heating devices/practices as the major sources of PM_{2.5} pollution in these areas.

DEQ has long recognized that mitigating impacts from these source types can be very difficult under the Clean Air Act. However, recognizing the significance of this issue from both a regulatory and public

health perspective, DEQ has proactively implemented various regulatory and non-regulatory efforts to address potential problems. For example, DEQ conducts non-required statewide ambient air quality monitoring for PM_{2.5} and posts associated near real-time data to the Department's Today's Air website. Doing so enables local and state public health departments, the general public, and other stakeholders to make informed decisions related to such impacts. DEQ also provides PM_{2.5} forecasting services and public education and outreach activities through the Today's Air website and implements a prescribed open burning program under the requirements contained in the Administrative Rules of Montana (ARM), Title 17, Chapter 8, Subchapter 6.

Further, and of primary concern related to "at risk" areas, is wintertime-impacts resulting from localized residential wood-fuel heating practices during prolonged mountain valley meteorological inversion events. Due to the unique and often localized nature of the emissions these efforts are being led by local health agencies with guidance from DEQ. In these communities, building trust between residents and local health authorities is essential to the success of PM_{2.5} mitigation efforts and local programs have expressed to DEQ that a nonattainment designation would add undue administrative burden and may even harm or stall ongoing efforts to proactively address these problems.

In Seeley Lake, DEQ is working closely with the Missoula City-County Health Department (MCCHD) to decrease wood smoke emissions from residential heating practices during the winter months. Efforts in the area have taken the form of both voluntary and regulatory programs. MCCHD has implemented the following localized programs and/or studies in an effort to address the problem in Seeley Lake:

- PM_{2.5} eBAM ambient monitoring saturation study to identify area(s) of concern;
- Episodic control programs/air quality alerts;
- Community education, outreach and awareness programs;
- LED reader board to inform the community of current air quality status; and
- Active woodstove change out program, to date:
 - 157 Stoves replaced; and
 - \$440,000 invested in replacing woodstoves in the Seeley Lake area;
 - more information available at www.seeleylakewoodstoves.com

DEQ expects to see immediate, direct, and significant measureable reductions in ambient PM_{2.5} concentrations from these ongoing efforts, much the same as the town of Libby has experienced with its woodstove change out, episodic control, and education and outreach programs. Under such programs the Libby area has attained both the annual and 24-hour forms of the PM_{2.5} NAAQS.

Your comments suggest that a federal reference method (FRM) or federal equivalent method (FEM) monitor should replace the existing non-FEM monitor operating in Seeley Lake. As in the past, this issue will be addressed through the annual monitoring network review process.

Regarding ambient PM_{2.5} levels in both the Butte and Helena areas, again, we agree that these areas are of concern. However, as evidenced by the data displayed in the table below neither area has experienced any exceedances of the annual weighted mean or violations of the design value for the annual form of the NAAQS during the years referenced. It is important to note that only the *annual* form of the NAAQS has been revised and thus the currently proposed initial area designations address only the annual form of the NAAQS.

Further, EPA has published guidance for the initial PM_{2.5} NAAQS area designations, which states, "The design value for the 2012 annual PM_{2.5} NAAQS is the 3-year average (e.g., 2010 to 2012) of the annual mean concentrations. This requires calculating annual PM_{2.5} design values based on ambient air quality

data from the most recent three calendar year period (i.e., December 2013 initial area designations should focus on data from 2010 to 2012).”¹ The following table displays PM_{2.5} levels in recent years with all exceptional events removed as well as with only EPA-concurred exceptional events removed.² The following table shows that both areas mentioned have not experienced any exceedances of the annual weighted mean and are therefore attaining the revised annual PM_{2.5} NAAQS of 12 ug/m³ for the 2010-2012, 2009-2011, and 2008-2010 design values.

Recent and Historical Design Values for PM_{2.5} in Silver Bow Co. and Lewis & Clark Co.

	Year(s)	All Exceptional Events Removed		Only Concurred Events Removed	
		Butte (Silver Bow) 30-093-0005	Helena (Lewis & Clark) 30-049-0026	Butte (Silver Bow) 30-093-0005	Helena (Lewis & Clark) 30-049-0026
		Annual Weighted Mean	2008	9.9	7.2
	2009	9.7	7.6	9.8	7.8
	2010	9.7	9.2	9.7	9.3
	2011	9.3	7.7	9.9	8.0
	2012	7.7	7.4	11.2	9.4
Design Values (3 Year Avg. of Annual Weighted Mean)	2008-2010	9.8	8	9.9	8.1
	2009-2011	9.6	8.2	9.8	8.4
	2010-2012	8.9	8.1	10.3	8.9

DEQ recognizes that maintaining attainment status for the PM_{2.5} NAAQS is a priority in these areas. Therefore, as discussed previously, DEQ continues to proactively address mitigation of ambient PM_{2.5} levels in these areas by working closely with the local/County Health Departments. Both local programs appreciate the significance of this issue and accordingly have initiated ongoing efforts to reduce emissions in advance of a regulatory designation of nonattainment. These efforts include:

- Voluntary participation in EPA’s PM Advance program;
- Woodstove surveys, which have identified numbers of sources and existing perceptions among residents of the impacts that wood-burning devices have on air quality;
- Regulations limiting the type of fuel burned in solid fuel burning devices;
- Regulations limiting emissions and opacity from solid fuel burning devices;
- Episodic control programs/air quality alerts;
- Local open burning permit programs;
- LED reader boards to inform communities of current air quality status;
- Regulations limiting the type of wood burning appliances that can be installed and operated ; and
- Ambient monitoring saturation studies to identify localized areas of highest impact.

As noted above, both Lewis & Clark and Silver Bow Counties have committed to participation in EPA’s PM Advance program. This voluntary program is intended to guide state and local efforts to proactively

¹ EPA, “April 2013 Guidance for Area Designations for the 2012 Annual PM_{2.5} NAAQS,” pp. 14-15.

² The Technical Support Document noticed for public comment with Montana’s initial 2012 PM_{2.5} NAAQS designations provides more detailed information regarding concurred and non-concurred exceptional events.

address PM_{2.5} impacts in at-risk areas to facilitate continued compliance with the NAAQS (visit <http://www.epa.gov/ozoneadvance/> for more information). DEQ is directly engaged with both local programs and the EPA in this effort. Generally, participation in the PM Advance program involves developing an area-specific "Action Plan", much like a nonattainment area control plan, to be submitted to EPA. Development of area-specific Action Plans will involve local stakeholder participation.

Based on available information, Montana's proposed initial state-wide designations correctly classify all areas in the state as either attainment or unclassifiable for the revised annual form of the PM_{2.5} NAAQS. In an effort to proactively address impacts in "at risk" areas without the unnecessary regulatory burden associated with a nonattainment designation DEQ has partnered with affected local programs to address these issues.

Thanks again for expressing your concern. Should you have any additional questions please contact Eric Merchant by telephone at (406) 444-1457 or by email at emerchant@mt.gov.

Sincerely,



Stephen Coe, P.E., Senior Planning Engineer (for Eric Merchant, Planning Section Supervisor)
Air Resources Management Bureau

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