

OFFICE OF THE GOVERNOR
STATE OF MONTANA

GREG GIANFORTE
GOVERNOR



KRISTEN JURAS
LT. GOVERNOR

January 16, 2024

Kathleen 'KC' Becker
Regional Administrator
United States Environmental Protection Agency
Region VIII, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202-1129

RE: Incorporation of Missoula City-County Air Pollution Control Program Rule Revisions into Montana State Implementation Plan

Dear Regional Administrator Becker:

Enclosed are proposed revisions to Montana's State Implementation Plan (SIP). More specifically, this submittal contains documentation supporting the incorporation of Missoula City-County Air Pollution Control Program rule revisions into the Montana SIP and the withdrawal of a previously submitted SIP revision.

These rule revisions are reasonably necessary for Missoula County to meet and maintain air quality that complies with the National Ambient Air Quality Standards (NAAQS) on behalf of the State of Montana. These rule revisions have been approved by the Montana Department of Environmental Quality (DEQ) via administrative order.

In addition to numerous administrative changes, these rule revisions include more substantive amendments. The most significant revision is the shift of Missoula's wintertime oxygenated fuel (oxyfuels) program from a control measure to a contingency measure. Missoula has implemented an oxyfuels program since 1992 to address carbon monoxide emissions. Carbon monoxide is no longer an issue in the Missoula area and air dispersion modeling demonstrates the area is not at risk of violating carbon monoxide air quality standards with the transfer of the oxyfuels program as a control measure to a contingency measure. In addition, the oxyfuels program has become an administrative and financial burden for Missoula County residents and local government. It is important for these small county air programs to prioritize the activities and requirements that have the greatest impact on ambient air quality and community health.

Lastly, the State of Montana formally requests to withdraw from EPA's consideration, Missoula City-County Air Pollution Control Program's Rule 9.205(1)(c) submitted in 2016. This request for withdrawal does not apply to any other SIP revisions submitted in 2016 to EPA. This rule has been renumbered from the previously submitted package, formally referenced by Missoula in 2016 as Rule 9.204(1)(e) and (f).. Specifically, the section in question states, "Approval of the alternative test method is at the sole discretion of the department", which EPA finds to be unsuitable due to the discretion provided to the county.

The proposed SIP revisions were noticed for a 30-day public comment period that ended on October 9, 2023, and opportunity for a public hearing was provided. Comments were received and addressed with a general response. All comments received were positive and in support of Missoula discontinuing the oxygenated fuels program.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Gianforte", is written over a printed name and title.

GREG GIANFORTE
Governor