
STATE OF MONTANA
AIR QUALITY CONTROL
IMPLEMENTATION PLAN

Subject: Cascade County
Carbon Monoxide Limited
Maintenance Plan

7.10 GREAT FALLS CARBON MONOXIDE LIMITED MAINTENANCE PLAN

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7.10.1 Introduction

Great Falls was designated nonattainment by the Environmental Protection Agency (EPA) for carbon monoxide (CO) in a September 9, 1980, Federal Register (FR) notice (45 FR 59315). This designation followed sixteen violations of the National Ambient Air Quality Standard (NAAQS) 8-hour CO standard at the original 10th Avenue South monitor. The NAAQS for CO is 9.0 parts per million (ppm) for an 8-hour average concentration, not to be exceeded more than once per calendar year. Consensus between EPA and local officials established the 10th Avenue South corridor as the nonattainment boundary in lieu of the city limits.

Following the nonattainment designation, control plans were developed, but none were EPA approved. Great Falls was reevaluated in September 1990, based on the 1990 Clean Air Act Amendments (CAAA) and the lack of exceedances in the CO monitoring data for 1988 and 1989. In a November 6, 1991 Federal Register notice (56 FR 56799), Great Falls was listed as a “not classified” nonattainment area for CO. However, redesignation requires a new emission inventory and development of a maintenance plan.

The Montana Department of Environmental Quality (DEQ) developed this redesignation request with guidance from the 1990 CAAA and a September 4, 1992 EPA memo from John Calcagni to the EPA Regional Air Directors. Section 107(d)(3)(E) of the CAAA defines the five required criteria of a redesignation request. The criteria are as follows:

- Criterion 1: Attainment of the Applicable National Ambient Air Quality Standard*
- Criterion 2: State Implementation Plan Approval*
- Criterion 3: Permanent and Enforceable Improvements in Air Quality*
- Criterion 4: Fulfillment of CAAA Section 110 and Part D Requirements*
- Criterion 5: Fully Approved Maintenance Plan under CAAA Section 175A*

Each of these criteria has been accomplished and are demonstrated in this CO redesignation

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request. The following pages address each of the five redesignation criteria.

Criterion 5 is addressed based on Great Falls' fulfillment of criterion addressed in the October 6, 1995 EPA memo from Joseph Paisie, Group Leader for Integrated Policy and Strategies Group. That memo states that nonclassifiable CO nonattainment areas fulfilling specific criterion could choose to seek redesignation under a less rigorous plan than the full maintenance plan (limited maintenance plan or LMP). Great Falls currently meets the criterion as outlined in the Paisie memo by having a CO design value at or below 7.65 ppm (85 percent of exceedance levels).

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7.10.2 **Criterion 1: Attainment of the Applicable National Ambient Air
Quality Standard**

A. Ambient Air Quality Data

Ambient CO data was collected at the State and Local Air Monitoring Station (SLAMS) site located at Skyway Conoco at 700 10th Avenue South (30-013-1025). Data was collected and quality assured in accordance with 40 CFR Part 58 and recorded in the Aerometric Information Retrieval System (AIRS). EPA has approved this SLAMS site and the data collected. This site, particularly considering the nature of the nonattainment area (the 10th Avenue South corridor), is considered to be representative of the area of highest CO concentration in Great Falls.

The CO quick look report for this monitoring site is on the following page, Table 7.10.2A, and contains all of the data for 1998 and 1999. The maintenance demonstration discussed in the maintenance plan section relies on the most recent eight quarters worth of data. No CO NAAQS violations have been recorded for 1998 or 1999. Both demonstrations (the quick looks reports and the maintenance demonstration) indicate that the CO NAAQS has been attained.

B. Supplemental EPA-Approved Air Quality Modeling

Supplemental air quality modeling will not be addressed in this redesignation request since the Great Falls area qualifies for the LMP as described in the October 6, 1995 Paisie memo.

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Table 7.10.2A EPA AIRS Quick Look Report of CO Emissions in Great Falls, Montana (1998 and 1999)

DATE 00/02/01
AMP450

EPA AEROMETRIC INFORMATION RETRIEVAL SYSTEM (AIRS)
AIR QUALITY SUBSYSTEM
QUICK LOOK REPORT
MONTANA

CARBON MONOXIDE (42101)
P
O M
C T CITY

UNITS: 007 PPM

SITE ID	C T	CITY	COUNTY	ADDRESS	REP YR ORG #OBS	MAX 1-HR		OBS> 35	MAX 8-HR		OBS> 9	METH	
						1ST	2ND		1ST	2ND			
30-013-1025	1	2	GREAT FALLS	CASCADE	SKYWAY CONOCO, 700-10TH	98 003 8359	10.3	8.7	0	5.3	4.5	0	093
30-013-1025	1	2	GREAT FALLS	CASCADE	SKYWAY CONOCO, 700-10TH	99 003 7962	7.8	7.1	0	3.6	3.5	0	093

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7.10.3 Criterion 2: State Implementation Plan Approval

A. History

Great Falls was designated as nonattainment by EPA for CO in a September 9, 1980 Federal Register notice (45 FR 59315). This designation followed sixteen violations of the 8-hour CO NAAQS at the original 10th Avenue South monitor. Consensus between EPA and local officials established the 10th Avenue South corridor as the nonattainment boundary in lieu of the city limits. Following the nonattainment designation, control plans were developed, but none were EPA approved. The primary contributors to the CO problem, as listed in the 1977 emission inventory, were motor vehicle emissions, wood smoke, and industrial processes. The March 9, 1984 control plan demonstrated attainment based on projected automobile emission reductions and a significant reduction in CO from the Phillips Refinery (purchased by Simmons and finally by Montana Refining Company or MRC). That control plan was withdrawn due to the failure of the Phillips Refinery to modify their catalytic cracking unit. A second control plan was submitted to EPA on March 28, 1986. On January 26, 1987 (52 FR 2732), EPA proposed to approve the Great Falls CO control plan. However, Great Falls missed the December 31, 1987 attainment deadline (Great Falls had a violation of the standard in 1987) and the Montana CO State Implementation Plan (SIP) was ruled inadequate, resulting in a “SIP call” for the Great Falls CO nonattainment area on May 26, 1988. On September 7, 1990, EPA published two actions regarding the Great Falls element of the SIP. EPA published a proposed rule that would disapprove the attainment demonstration contained in the March 28, 1986 SIP revision (55 FR 36839). However, EPA never took final action on that proposed rule. EPA also published a final rule on September 7, 1990 that approved the CO control measures from the March 28, 1986 CO SIP revision for their strengthening effect on the SIP (55 FR 36812).

B. 1990 Clean Air Act Amendments

For CO areas, the CAAA classified areas according to recent monitored levels of CO; the Great Falls CO nonattainment area fell below the lowest CAAA threshold for “moderate” areas and was classified as a “not classified” area on November 6, 1991 (56 FR 56799). Requirements for “not classified” CO nonattainment areas appeared in the General Preamble for implementation of

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the Title I of the CAAA on April 16, 1992 (57 FR 13498). The provisions are presented at 57 FR 13535. See section “(2) Attainment demonstration.” which states:

“Section 187(a)(7) specifically exempts moderate areas with design values less than 12.7 ppm from requiring an attainment demonstration. Because these moderate areas are exempt from this requirement, it would seem unreasonable to subject this requirement to an area that was not violating the standard. Therefore, EPA will presume that the existing SIP requirements and any existing and future Federal requirements (e.g., Title II rules) will be sufficient to provide for attainment in these areas.”

Based on the above statement and letter dated December 8, 1999 from Larry Svoboda, Unit Leader of the Air Quality Planning and Management Unit of the Air and Radiation Program, EPA Region VIII, the CAAA superceded the prior requirement for an attainment demonstration, and therefore one is not required. Therefore, the requirement for SIP approval has been satisfied by virtue of EPA’s September 7, 1990 approval of the control measures from the March 28, 1986 CO SIP revision.

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7.10.4 Criterion 3: Permanent and Enforceable Improvements in Air Quality

A. Overview`

The State must demonstrate, based on Section 107(d)(3)(E) of the 1990 CAAA, that the improvement in air quality leading to attainment of the NAAQS and the redesignation request is based on permanent and enforceable measures, and that the reductions are not the result of temporary reductions in emissions or unusually favorable meteorology.

It is reasonable to attribute the improvement in ambient CO concentrations in the Great Falls CO nonattainment area to emission reductions that are permanent and enforceable. The emission reductions are the result of implemented federal, state, and local controls.

Economics are not responsible for improved ambient air quality levels in the Great Falls area. It can be assumed that population, employment, and traffic growth would increase CO emissions and the potential for elevated CO concentrations. As mentioned in the 1996 Great Falls CO emission inventory (EI), the Montana Department of Commerce estimated the population growth in Cascade County to be 4.8 percent between 1990 and 1996. If proportional growth rates were used for employment and traffic counts or vehicle kilometers traveled (VKT), overall growth in Cascade County would indicate higher not lower CO concentrations.

Favorable meteorology does not appear to be responsible for the improvement in CO levels. From 1990 to 1998, based on data found in the AIRS database, CO design values for the Great Falls area ranged between 4.5 and 6.9 ppm, with no apparent trends. Great Falls temperature data for November, December, and January were examined for the 1990-98 time period (1999 data was not used since it was only available for January at the time of comparison). The average temperature for that time period for the months studied was not significantly different (at a 95 percent confidence level) than the 61-year average monthly temperatures from the National Weather Service station at Great Falls. And for November and December, the 1990-98 average temperatures were actually lower than the 61-year average. Lower temperatures generally result in higher CO emissions from automobiles. Therefore, DEQ concluded that weather was not responsible for reaching CO attainment levels in the Great Falls area.

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B. Control Measures

The State concludes that the following permanent and enforceable control measures have resulted in the improvement in air quality in the Great Falls area. These control measures will remain in place for the duration of the initial maintenance period (through 2012) to ensure continued maintenance of the CO NAAQS in the Great Falls area. These control measures only include

i. Federal Motor Vehicle Emission Control Program

A very effective CO emission reduction measure is the Federal Motor Vehicle Emission Control Program (FMVECP). This program has dramatically reduced CO emissions through a continuing process of requiring automobile manufacturers to produce new vehicles that meet tighter and tighter emission standards. As older, more polluting vehicles are replaced with newer vehicles, CO emissions in the Great Falls area will continue to decline.

To quantify this reduction, the Great Falls EI study area was used to encompass the community as a whole and not just the small nonattainment area. A comparison of the 1990 and 1996 emission inventory information from mobile sources suggests that the FMVECP combined with fleet turnover has resulted in emission reductions despite growth in VKT. See Table 7.10.4A below.

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Table 7.10.4A Key Demographic, VKT, and CO Emissions Data and Percentage Change From 1990 to 1996 in Great Falls, Montana

	1990	1996	Percent change
Population ^a			
-Great Falls City Limits	55,125	57,695	4.66
-Cascade County	77,691	81,087	4.37
Great Falls EI Study Area ^b			
-VKT/CO day	1,122,363	1,436,067	27.94
-kg CO/CO day	54,576 ^c	53,946 ^d	-1.15

^a Population values based on the 1990 U.S. Census and growth rates developed by the Montana Department of Commerce.

^b The Great Falls CO EI study area consists of 150 1-km² grids, covering the Great Falls city area (the geographic inventory area was identical to the area modeled by the Montana Department of Transportation as a transportation study area). The same study area was used for both 1990 and 1996 Great Falls CO EIs.

^c This value was calculated using Mobile4.1 for the 1990 Great Falls, MT CO EI (revised 1996).

^d This value was calculated using Mobile5a for the 1996 Great Falls, MT CO EI with the same vehicle speeds as in the 1990 Great Falls EI.

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B. CAAA Part D

Before the Great Falls ‘Not Classified’ CO nonattainment area may be redesignated to attainment, the State must have fulfilled the applicable requirements of part D. Under part D, an area's classification indicates the requirements to which it will be subject. Subpart 1 of part D sets forth the basic nonattainment requirements applicable to all nonattainment areas, whether classified or nonclassifiable.

The relevant Subpart 1 requirements are contained in sections 172(c) and 176 of the CAA. EPA’s General Preamble (57 FR 13498, April 16, 1992) provides EPA's interpretations of the CAA requirements for not classified CO areas:

Although it seems clear that the CO-specific requirements of subpart 3 of part D do not apply to CO "not classified" areas, the 1990 CAAA are silent as to how the requirements of subpart 1 of part D, which contains general SIP planning requirements for all designated nonattainment areas, should be interpreted for such CO areas. Nevertheless, because these areas are designated nonattainment, some aspects of subpart 1 necessarily apply. See 57 FR 13535.

Under section 172(b), the applicable section 172(c) requirements, as determined by the Administrator, were due no later than three years after an area was designated as nonattainment under section 107(d) of the amended CAA (see 56 FR 56694). In the case of the Great Falls area, the due date was November 15, 1993. As the Great Falls CO redesignation request and maintenance plan were not submitted by the Governor until after this date, EPA’s General Preamble (57 FR 13535) provides that the applicable requirements of CAA section 172 are 172(c)(3) (emissions inventory), 172(c)(5)(new source review permitting program), and 172(c)(7)(the section 110(a)(2) air quality monitoring requirements)). The maintenance plan needs to describe that these requirements have been met.

EPA has determined that Part D requirements for Reasonably Available Control Measures (RACM), an attainment demonstration, reasonable further progress (RFP), and contingency measures (CAA section 172(c)(9)) are not applicable to not classified CO areas. See 57 FR 13535, April 16, 1992. It is also worth noting that EPA has interpreted the requirements of

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sections 172(c)(1) (RACM), 172(c)(2) (RFP), 172(c)(6)(other measures), and 172(c)(9)(mandatory contingency measures) as being irrelevant to a redesignation request because they only have meaning for an area that is not attaining the standard. This is explained in EPA's September 4, 1992, John Calcagni memorandum entitled, "Procedures for Processing Requests to Redesignate Areas to Attainment", and the General Preamble, 57 FR at 13564, dated April 16, 1992. Finally, the State has not sought to exercise the options that would trigger sections 172(c)(4)(identification of certain emissions increases) and 172(c)(8)(equivalent techniques). Thus, these provisions are also not relevant to this redesignation request.

Section 176 of the CAA contains requirements related to conformity. Although EPA's regulations (see 40 CFR § 51.396) require that states adopt transportation conformity provisions in their SIPs for areas designated nonattainment or subject to an EPA-approved maintenance plan, EPA has decided that a transportation conformity SIP is not an applicable requirement for purposes of evaluating a redesignation request under section 107(d) of the CAA. This decision is reflected in EPA's 1996 approval of the Boston carbon monoxide redesignation. (See 61 FR 2918, January 30, 1996.)

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7.10.6 Criterion 5: Fully Approved Maintenance Plan Under CAAA Section 175A

According to CAAA Section 107(d)(3)(E), for an area to be redesignated to attainment, EPA must fully approve a maintenance plan that fulfills the requirements of CAAA Section 175A. The maintenance plan will constitute a SIP revision and must provide for the maintenance of the CO NAAQS in the area for at least ten years after redesignation. The LMP option, fulfilling the maintenance plan requirement for “not classified” nonattainment areas, includes the following core provisions:

- Provision 1: Attainment Inventory*
- Provision 2: Maintenance Demonstration*
- Provision 3: Monitoring Network/Verification of Continued Attainment*
- Provision 4: Contingency Plan*
- Provision 5: Conformity Determinations under Limited Maintenance Plans*

All of the provisions have been completed and are demonstrated in this CO redesignation request. The following pages address each of the five core provisions.

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7.10.6.1 Provision 1: Attainment Inventory

A 1996 emission inventory was submitted to EPA on February 1, 2000 to provide an attainment inventory for the Great Falls CO redesignation request. The CO emissions in the emission inventory were calculated to represent a standard CO season day, a “typical winter day” in a typical CO season for base year 1996 (January 1 to December 31). The CO season encompassed November, December, and January 1996. A weekday within the CO season was selected since the highest average daily traffic (ADT) generally occurred during the work week period. The study area, as mapped in Figure 7.10.6.1A, included 150 one-kilometer squared (km²) grids encompassing the Great Falls nonattainment area, Great Falls urban area, and surrounding region including the community of Black Eagle.

The total estimated amount of CO in the 1996 Great Falls CO emission inventory study area on a standard CO season weekday was 53,945.52 kilograms (kg). Twenty-four area and three industrial point sources were identified as significant CO emitters. These sources of carbon monoxide were reduced into seven broad source categories: aviation exhaust (721.21 kg/day), commercial and residential natural gas combustion (312.62 kg/day), industrial point processes (180.46 kg/day), nonroad motor exhaust (4,676.0 kg/day), railroad locomotive exhaust (24.30 kg/day), residential wood burning (5,644.12 kg/day), and roadway motor vehicle exhaust (42,386.81 kg/day). As expected, motor vehicle tailpipe exhaust contributed the majority (78.57 percent) of all estimated CO emissions. Minor contributing source categories and their corresponding daily percentage of contribution were residential wood burning devices (10.46 percent), nonroad motor exhaust (8.67 percent), and aviation exhaust (1.34 percent). Commercial and residential natural gas consumption, railroad locomotive exhaust, and three combined industrial point sources all emitted less than one percent of the estimated daily CO emissions in the 1996 Great Falls CO emission inventory study area. Source contributions are displayed graphically in Figure 7.10.6.1B.

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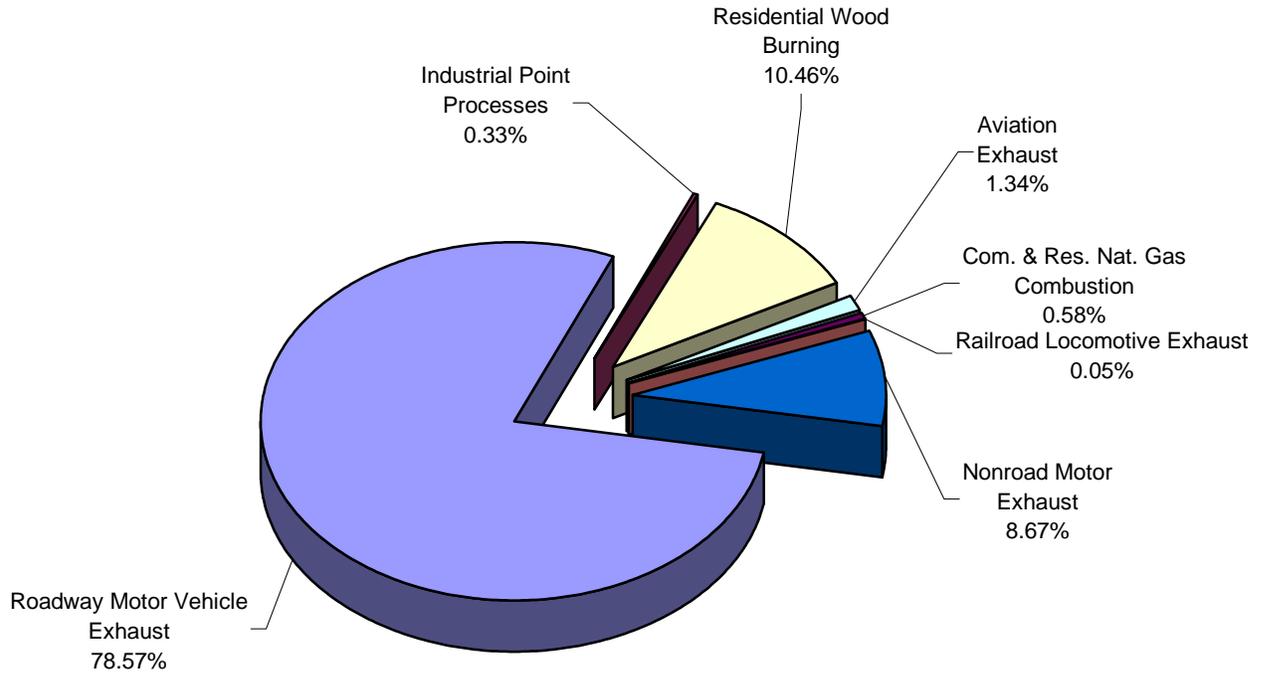


Figure 7.10.6.1B Total Daily Carbon Monoxide Emissions and Percentage Contributions by Source Category in the 1996 Great Falls CO Emission Inventory Study Area

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7.10.6.2 Provision 2: Maintenance Demonstration

An October 6, 1995 EPA memo from Joseph Paisie, Group Leader for Integrated Policy and Strategies Group stated nonclassifiable CO nonattainment areas fulfilling specific criterion could choose to seek redesignation under a less rigorous plan than the full maintenance plan. To qualify for the limited maintenance plan option, the CO design value for the area, based upon the eight consecutive quarters (two years of data) used to demonstrate attainment, must be at or below 7.65 ppm (85 percent of exceedance levels of the NAAQS). Additionally, the design value for the area must continue to be at or below 7.65 ppm until the time of final EPA action on the redesignation request.

Design values are determined based on a June 18, 1990 EPA memo from William Laxton, Director of the Technical Support Division. For 8-hour CO, determining the design value requires finding the maximum and second maximum 8-hour values for the most recent two years or eight quarters of data. The highest of the second maximum values (or the “highest of the second highs”) is used as the design value for each CO monitoring site. If more than one monitoring site exists in the area, the highest site design value is used as the design value for the entire nonattainment area. One monitoring location, Skyway Conoco at 700 10th Avenue South, in the Great Falls nonattainment area has collected data for 1998 and 1999. Since the most recent eight quarters of data need to be used, 1998 and 1999 data was selected. As seen in Table 7.10.6.2A, the design value is 4.5 ppm, well below the 9.0 ppm NAAQS standard and below the 7.65 ppm limit for LMP eligibility. Therefore, Great Falls meets the air quality criteria for the LMP.

Table 7.10.6.2A Design Value Determined Based on 1998 and 1999 Data (Data Obtained From EPA AIRS Database)

<u>Year</u>	<u>Location</u>	<u>Site ID</u>	<u>Max 8-hour CO (ppm)</u>	
			<u>1st High</u>	<u>2nd High</u>
1998	Skyway Conoco	300131025421011	5.3	4.5 (design value)
1999	Skyway Conoco	300131025421011	3.6	3.5

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7.10.6.3 Provision 3: Monitoring Network/Verification of Continued Attainment

CO compliance monitoring in the Great Falls area, including the Skyway Conoco location, will continue in accordance with the QAPP, the EPA Quality Assurance Manual (EPA-600/9-76-005, revised December 1984), 40 CFR Part 50 including Appendix C, and 40 CFR Part 58 including Appendices A through G. Accuracy data for the Great Falls CO sites and precision data for the Montana CO network will continue to be submitted to EPA on a regular basis through the federal Precision and Accuracy Reporting System.

DEQ and the Cascade City-County Health Department (CCCHD) intend to operate the Skyway Conoco site on an indefinite basis. Any future changes in the CO monitoring will be addressed in the annual Montana Network Review (MNR) and an EPA network modification request form will be submitted to EPA for approval prior to making any changes. Emergency episode CO monitoring in Great Falls shall be conducted, if necessary, in accordance with Montana's Emergency Episode Avoidance Plan.

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7.10.6.4 Provision 4: Contingency Plan

Section 175(A)(d) of the CAAA requires that the maintenance plan contain contingency provisions to assure that the State will promptly correct any violation of the CO NAAQS that occurs after the redesignation of Great Falls to attainment. EPA's redesignation guidance notes that the State is not required to have fully adopted contingency measures that would take effect without further action by the State. However, the contingency plan should ensure that contingency measures are adopted expeditiously once the need is triggered. The primary elements of the plan involve the tracking and triggering measures to determine when contingency measures are needed and a process for implementing appropriate control measures.

A. CO Concentration Tracking

Tracking CO for the Great Falls area will consist of monitoring and analyzing CO concentrations in that area. In accordance with 40 CFR Part 58, Montana will continue to operate and maintain the Great Falls monitoring network to demonstrate ongoing compliance with the CO NAAQS.

B. SIP-Mandated Trigger and Response

i. Trigger

The LMP will use one exceedance of the CO NAAQS as the trigger for adopting specific contingency measures. The adopted contingency measure(s) will be implemented only if a violation of the CO NAAQS occurs. Notification to EPA and to the local governments in the Great Falls area of any exceedance will occur within 60 days as part of the Quality Assurance/Quality Control (QA/QC) monitoring procedure.

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ii. Response

Upon notification of a CO NAAQS exceedance, DEQ and CCCHD will pursue appropriate contingency measure(s) intended to avoid a violation of the CO NAAQS. Information on the historical exceedances of the standard, the meteorological conditions related to the recent exceedance(s), and the most recent estimates of population and VKT growth and emissions will be reviewed. The possibility that an exceptional or natural event occurred will also be evaluated. Following the review of this information, the necessary contingency measure(s) will be proposed for local adoption. The local adoption process will be completed within three months of the exceedance notification. The contingency measures provide a maintenance area with the opportunity to maintain its status as an attainment area.

If and when a violation of the NAAQS occurs, the locally adopted contingency measure(s) will be fully implemented within one year. Section 175(A)(d) of the CAAA states:

The failure of any area redesignated as an attainment area to maintain the national air quality standard concerned shall not result in a requirement that the State revise its State implementation plan unless the Administrator, in the Administrator's discretion, requires the State to submit a revised State implementation plan.

C. Possible Contingency Measures

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The CCCHD may choose one or more contingency measures to recommend to local officials and DEQ for consideration. The CCCHD will select contingency measures designed to bring the area back into compliance with the CO NAAQS quickly and to specifically meet the needs of the Great Falls area. Some potential contingency measures include:

- implementing an oxygenated fuel program by local regulations in the Great Falls or Cascade County area for the winter months of November, December, and January (typically the months with the highest ambient CO levels);
- implementing a high pollution day, episodic woodburning curtailment program; and/or
- other emission control measures appropriate for the area that are yet to be defined.

D. Maintenance Plan Requirements

Eight years after EPA redesignates the Great Falls area to attainment, the State commits to submit to EPA a revised maintenance plan that provides for maintenance of the CO NAAQS for an additional 10 years after the expiration of the initial maintenance period (through 2012) covered by this maintenance plan

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7.10.6.5 Provision 5: Conformity Determinations Under Limited Maintenance Plans

Since the Great Falls area is a ‘Not Classified’ nonattainment CO area, only some of the general provisions of the CAA Part D apply. These include the “General” and “Transportation” conformity provisions of CAA Section 176(c). The conformity provisions ensure that federally funded or approved projects and actions conform to the air quality planning goals of the Great Falls CO control plan before they are constructed. For the purpose of the LMP for Great Falls, the conformity issues are slightly different than in a full maintenance plan and are explained below.

The transportation conformity rule of November 24, 1993 (58 FR 62188) and the general conformity rule of November 30, 1993 (58 FR 63214) apply to nonattainment areas and maintenance areas operating under maintenance plans. Under either rule, conformity can be demonstrated by indicating that the expected emissions from planned actions are consistent with the emissions budget for the area. In areas with LMPs, conformity determinations are still required, but a LMP has no emission budget because “emissions budgets in limited maintenance plan areas may be treated as essentially not constraining for the length of the initial maintenance period” (“Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas,” memorandum from Joseph Paisie to the EPA Regional Air Branch Chiefs, October 6, 1995).

For general conformity, all projects are considered to satisfy the “budget test” specified in 40 CFR 93.158(a)(5)(i)(A) once EPA has approved this redesignation request. For transportation conformity, federal actions requiring conformity determinations are considered to satisfy the budget test specified in sections 93.118, 93.119 and 93.120 of the conformity rule once this LMP is found adequate by EPA. In Great Falls, federal actions are also considered to satisfy the transportation conformity rule’s requirements for expeditious implementation of transportation control measures (TCMs), because there are no TCMs in the Great Falls SIP. Transportation plans, transportation improvement programs and Federal projects still require conformity determinations in order to proceed, and Federal projects are still subject to the hotspot modeling requirements of the transportation conformity rule.

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