



RECOMMENDATION FOR ADOPTION

PROPOSED AREA BOUNDARY RECOMMENDATIONS FOR THE 2010 SULFUR DIOXIDE STANDARD: DECEMBER 2020 DESIGNATIONS

On March 26, 2020, the Missouri Air Conservation Commission held a public hearing for the action titled - *Proposed Area Boundary Recommendations for the 2010 Sulfur Dioxide Standard: December 2020 Designations*. A summary of comments received and the air program's corresponding responses is included on the following pages. No revisions were made to the proposed action as a result of comments received. However, revisions to the analysis included in the proposed action were made to include additional documentation as a result of comments.

The air program intends to submit these recommendations to EPA by May 1, 2020 for consideration during the designation process. EPA must finalize designations for these areas by December 31, 2020. This action will not be submitted for inclusion in the Missouri State Implementation Plan.

The complete recommendations have not been reprinted in the briefing document due to their volume. However, the purpose statement and summary of the recommendations have been included for reference. The entire recommendations are available for review at the Missouri Department of Natural Resources' Air Pollution Control Program, 1659 East Elm Street, Jefferson City, Missouri 65101, (573) 751-4817. It is also available online at <http://dnr.mo.gov/env/apcp/stateplanrevisions.htm>

The air program recommends the commission adopt these boundary designation recommendations. If the commission adopts these recommendations, the air program intends to submit them to the U.S. Environmental Protection Agency.

PURPOSE

The purpose of this document is to provide Missouri’s updated recommendations for area boundary designations under the 2010 1-hour sulfur dioxide (SO₂) standard for two areas of the state. The Missouri Department of Natural Resources’ Air Pollution Control Program (air program) recommends a nonattainment area boundary designation in a portion of New Madrid County surrounding Magnitude 7 Metals (M7M) and the Associated Electric Cooperative Inc. - New Madrid Power Plant (NMPP). The air program recommends attainment/unclassifiable designations for the remainder of New Madrid County and all of Iron County, which contains the Doe Run – Buick Resource Recycling Facility (Buick).

The air program is submitting these updated boundary recommendations pursuant to the federal Data Requirements Rule (DRR) based on refined technical evaluations for two areas that remain undesignated under the 2010 SO₂ standard. In the DRR for the 2010 SO₂ standard, EPA established an approach for evaluating SO₂ concentrations in areas that remained undesignated. The DRR required evaluation of air quality in areas surrounding sources that emitted more than 2,000 tons of SO₂ in the most recent emission year at the time (2014). The two areas discussed in this document contain the three sources in the state that exceed the emissions threshold, have not yet been designated under the 2010 SO₂ standard, and have elected to characterize the air quality surrounding their facilities through air monitoring. Per a court ordered consent decree, signed March 2, 2015, this fourth and final round of designations must occur by December 31, 2020.

SUMMARY OF AREA BOUNDARY RECOMMENDATIONS

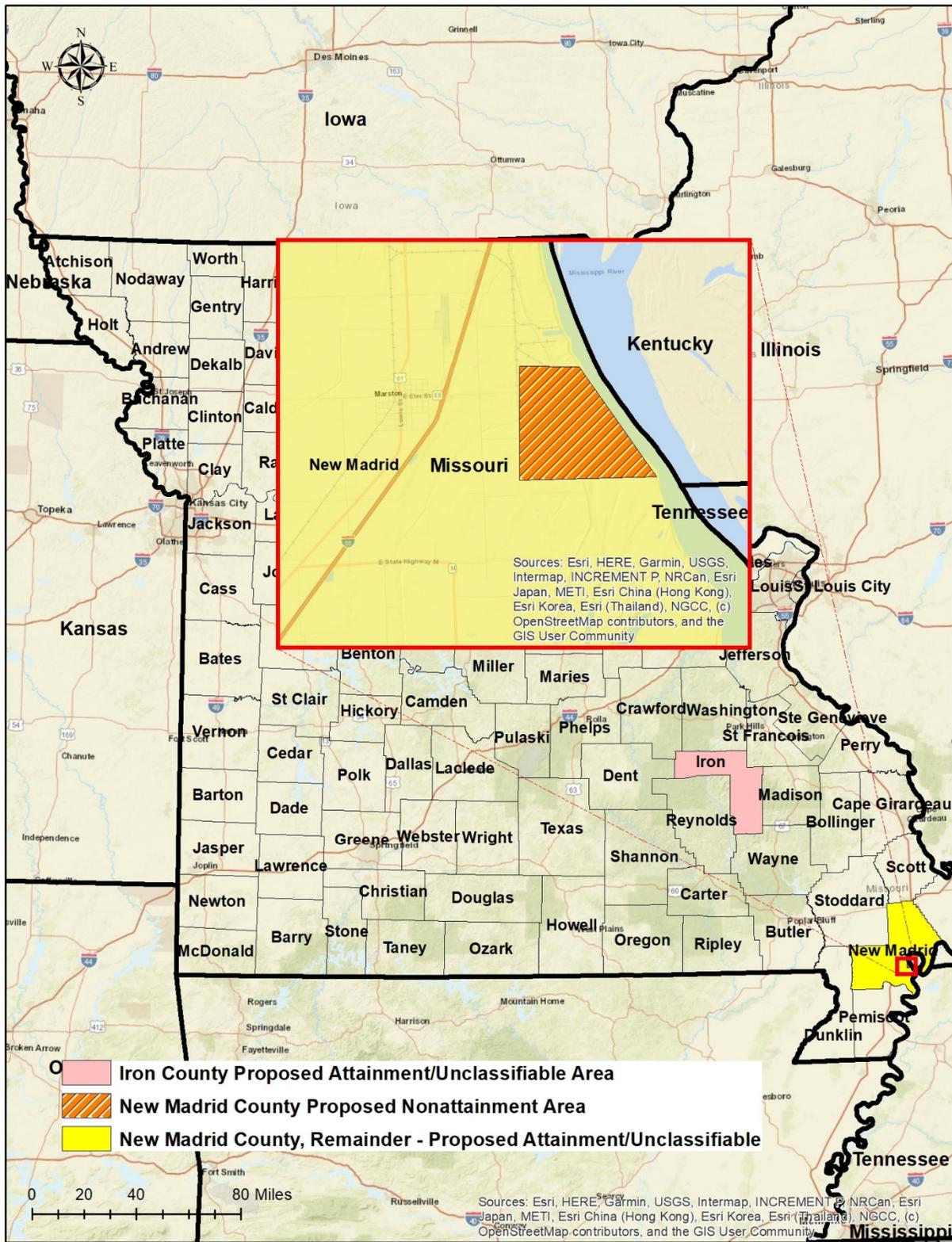
The air program is recommending a nonattainment boundary for the area surrounding M7M and NMPP that chose monitoring as their preferred method of characterization. The air program determined the nonattainment boundary for the area based on the process outlined in EPA’s boundary designations guidance. The air program used air dispersion modeling to inform the extent of the recommended nonattainment area. The air program is also proposing to recommend an attainment/unclassifiable designation for the remainder of New Madrid County and the entirety of Iron County based on the analysis provided in this document.

Table 1 summarizes the area boundary designation recommendations for the 2010 1-hour SO₂ standard discussed in this document and appendices. The respective appendices discuss in more detail the data and analysis used to support the recommendations. The map in Figure 1 graphically depicts the recommended nonattainment area boundary and the attainment/unclassifiable areas.

Table 1 – Missouri’s Boundary Recommendation Summary for the 2010 SO₂ Standard Round - 4 Designations

Affected Source	Area Boundary	Area Designation Recommendation
Magnitude 7 Metals and New Madrid Power Plant	Area encompassing the property boundaries of these two facilities	Nonattainment
	Remainder of New Madrid County	Attainment/unclassifiable
Doe Run – Buick Resource Recycling Facility	Iron County	Attainment/unclassifiable

Figure 1 – 2010 1-hour SO₂ Standard New Madrid County Nonattainment Area Boundary Recommendation for December 2020 Round of Designations



COMMENTS AND RESPONSES ON
PROPOSED AREA BOUNDARY RECOMMENDATIONS
FOR THE 2010 SULFUR DIOXIDE STANDARD: DECEMBER 2020 DESIGNATIONS

The public comment period for the *Proposed Area Boundary Recommendations for the 2010 Sulfur Dioxide Standard: December 2020 Designations* opened on February 24, 2020 and closed on April 2, 2020. No revisions were made to the proposed recommended boundaries as a result of comments. However, revisions to the analysis included in the proposed action were made to include additional documentation as a result of comments.

The following is a summary of comments received and the Missouri Department of Natural Resources' Air Pollution Control Program's (air program's) corresponding responses.

SUMMARY OF COMMENTS: During the public comment period for the proposed action, the air program received oral comments from Commissioner Pendergrass during the public hearing, and written comments from Associated Electric Cooperative Inc. (AECI), Magnitude 7 Metals (Magnitude 7), and the Great Rivers Environmental Law Center (GRELC).

COMMENT #1: During the public hearing for the proposed action, Commissioner Pendergrass asked if any other entities were included in or affected by the recommended nonattainment boundary in New Madrid County.

RESPONSE: The air program responded that most of the recommended nonattainment boundary in New Madrid County encompasses the property boundaries of Magnitude 7 and the AECI New Madrid Power Plant. The remainder of the recommended nonattainment boundary contains three tracts of land to the west of these two facilities. No additional structures outside these two facilities' property boundaries are included in the recommended nonattainment boundary. Therefore, aside from Magnitude 7 and the New Madrid Power Plant, there are no other existing entities or facilities affected by or included in the recommended nonattainment area. No changes were made as a result of this comment.

COMMENT #2: AECI commented that they do not object to the nonattainment designation or the recommended nonattainment boundary for the portion of New Madrid County that includes the property boundary of the New Madrid Power Plant. However, AECI wants to make clear that the New Madrid Power Plant is not contributing to nonattainment in the area. They state that the modeling indicates the highest single contribution from the New Madrid Power Plant at the three monitors in the area is only 36 percent of the level of the standard and it occurs at the West Entrance monitor, which currently has a 2017-2019 design value below the level of the 2010 sulfur dioxide (SO₂) standard.

RESPONSE: The air program understands AECI's comment about their relatively small impact on SO₂ concentrations in the area when compared to the level of the standard and the contributions attributable to Magnitude 7. The air program points out that the modeling data shared with the New Madrid Power Plant were based on continuous emissions monitoring system (CEMS) data that did not include hourly varying temperatures and exit velocities. The

New Madrid Power Plant submitted the variable data to the air program, which was then used in the final modeling included in the proposed recommendations. As discussed in Section A-1 of Appendix A of the proposed recommendations, the highest 99th percentile maximum daily 1-hour concentration at the three monitors in the area in 2017 was 13 parts per billion (ppb), which is only 17 percent of the level of the standard. During this time, AECI was operating normally, and Magnitude 7 was idled. It was only after Magnitude 7 started ramping up operations that the monitors in the area began measuring elevated levels of SO₂ approaching or exceeding the level of the standard. This supports a conclusion that if not for the emissions from Magnitude 7, the emissions from AECI alone would likely not be causing violations of the standard to occur in the area. While this does not mean that AECI has no contribution to the SO₂ concentrations being measured in the area, the evidence supports that the contributions from AECI are not the cause of the violations recorded at the monitors. No changes were made as a result of this comment.

COMMENT #3: Magnitude 7 commented that they agree with the proposed nonattainment boundary that encompasses the property boundaries of their facility and the neighboring New Madrid Power Plant. However, they expressed concerns about the ability of the air dispersion model, AERMOD, to accurately characterize the dispersion of emissions from their aluminum plant. They state that in some of the modeled scenarios included in the proposed recommendations, the modeled concentrations far exceed the levels recorded by the monitors in the area. They further note that the building downwash algorithm included in AERMOD has not been evaluated for aluminum plants and could be biasing the results.

RESPONSE: The air program understands Magnitude 7's concerns with the building downwash algorithm in AERMOD as it has not yet been evaluated for aluminum plants. However, as explained in Appendix A of the proposed recommendations, the air program modeled numerous scenarios to determine how to appropriately characterize emissions with the goal of achieving stronger model performance that was comparable to the measured monitoring data. All modeling scenarios evaluated resulted in a conclusion that the 64-stack battery associated with the emission release point for Carbon Bake 2 at Magnitude 7 is by far the most significant driver in determining the maximum modeled SO₂ concentrations in the area. As Magnitude 7 states in their comment, the monitored concentrations in the area are violating the SO₂ standard, which necessitates a nonattainment designation for an area that includes the extent of the violations and the nearby sources that are contributing to the violation. The proposed recommendation for the nonattainment boundary is intended to accomplish this. No changes were made as a result of this comment.

COMMENT #4: GRELC commented to explain the importance of the SO₂ standard, including the health effects, the process the U.S. Environmental Protection Agency (EPA) used to establish the standard, and the need to ensure the residents of New Madrid County are protected from elevated levels of SO₂ concentrations.

RESPONSE: The air program understands the process EPA used to establish the SO₂ standard and the importance of ensuring that all ambient air quality throughout the state complies with the standards that EPA sets to protect public health. The air program's purpose with the proposed recommendations is to determine a boundary that encompasses both the extent of the area experiencing violations and the nearby sources that are contributing to those violations as explained in EPA's guidance document for the SO₂ round four designations. No changes were

made as a result of this comment.

COMMENT #5: GRELC commented that all or a significant portion of New Madrid County should be designated nonattainment. They state that the area must include all areas violating the standard and all nearby areas that contain emission sources that are contributing to the violation. They cite EPA guidance stating the county boundary is an appropriate “starting point” for assessing the appropriate geographic boundaries for an SO₂ nonattainment area. They state the air program is ignoring the guidance by recommending a limited site-specific area, and that the nonattainment area needs to include the other seven permitted emission sources in the county.

RESPONSE: EPA’s Memorandum, titled – *Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 4* states that “a nonattainment area should contain the area violating the standard (e.g., the area around a violating monitor or encompassing modeled violations), as well as any nearby areas (e.g., counties or portions thereof) that contain emissions sources contributing to the violation.” EPA also stated that they expect to continue to consider county boundaries as the analytical starting point for determining SO₂ nonattainment areas, and that an evaluation of five factors for each area may be considered in determining the geographic scope of a nonattainment boundary. The air program followed EPA’s memorandum when it used the five factor technical analysis to determine the extent of the area violating the standard in New Madrid County.

The air program accounted for the other seven SO₂ emission sources in the county by establishing a fixed background concentration of 5 ppb or 13 micrograms per cubic meter (µg/m³). The air program utilized this approach as the other seven sources each reported less than half a ton of actual SO₂ emissions in 2018 and they emitted a total of 0.82 ton of SO₂ emissions in 2018. This fixed background concentration was added to the contributions from the two explicitly modeled sources for all hours included in the modeling analysis ensuring that all sources not explicitly modeled are accounted for in the analysis. The air program’s dispersion modeling was based on six modeling scenarios along with other factors, and the analysis concluded that the violating area only included areas that were inside the property boundaries of Magnitude 7 and the New Madrid Power Plant. Though the extent of the violating receptors does not encompass both property boundaries in their entirety, the air program extended the nonattainment area to include the total property boundaries and some additional tracts of land to the west of the properties to make the nonattainment boundary a more well-defined area. No changes were made as a result of this comment

COMMENT #6: GRELC commented that the air program should have undertaken additional monitoring prior to proposing the nonattainment area boundaries. They state EPA guidance requires that for new or repurposed monitors designed to characterize air quality around sources that elect to monitor should be targeted with the primary objective to identify peak SO₂ concentrations in the ambient air that are attributable to an identified emission source or group of sources. They state the air program has ignored this guidance by not installing any new additional monitors, nor called for the need to do so. They suggest the air program require additional monitors and use that data to better evaluate the boundary recommendations.

RESPONSE: All three of the monitors in the area were newly installed and became operational in January of 2017 as part of Round 4 evaluations under the 2010 Sulfur Dioxide NAAQS. The

monitors' locations were selected in accordance with the federal Data Requirements Rule (DRR) [80 FR 51052] with the purpose of capturing the area of maximum SO₂ concentrations around both Magnitude 7 and the New Madrid Power Plant, as Round 4 sources. EPA approved these monitors as meeting the requirements of the DRR when they approved the air program's 2017 annual monitoring network plan. EPA did not indicate that there was a need for additional monitoring sites at the time. EPA's memorandum referenced above indicates that existing monitors along with dispersion modeling is adequate to draw the extent of a nonattainment area. No changes were made as a result of this comment

COMMENT #7: GRELC commented that the air program should broaden its model to include SO₂ sources in the county other than Magnitude 7 and the New Madrid Power Plant. GRELC specifically cites two sources they believe should have been explicitly modeled in the analysis, Heartland Asphalt, which is located within 9 kilometers of Magnitude 7 and Bunge North American, which is within 12 kilometers of Magnitude 7. They state the air program failed to include any of the other seven sources in the county in its model, either as explicit sources, or as background concentrations. They state doing so fails to properly address the impact of the nonattainment designation on the nearby communities in the county. They state the model should be revised to include these sources, or employ a monitoring strategy instead.

RESPONSE: As mentioned in response to comment number five, those seven sources, including Heartland Asphalt Materials and Bunge North America, had total combined 2018 SO₂ emissions of 0.82 tons. For this analysis, the air program established a background concentration that is intended to capture the impacts of these seven sources as outlined in EPA modeling guidance. In comparison, Magnitude 7 had 1,772.02 tons and the New Madrid Power Plant had 14,865.61 tons.

In addition, the seven sources are not clustered in one area. Rather, they are located in different parts of New Madrid County. The three closest sources to the recommended nonattainment boundary had total combined 2018 SO₂ emissions of 0.02 tons for the entire year and are accounted for in the established background concentration. The two emission sources named in the comment, Heartland Asphalt Materials and Bunge North America, had total combined 2018 SO₂ emissions of 0.76 tons. These sources are both more than 8 kilometers away from the recommended nonattainment boundary. Therefore, the exclusion of these two sources from the nonattainment area is justified due to their distance from the recommended nonattainment boundary and their low potential concentration gradients associated with their low emission levels. The air program has accounted for the potential contributions to the violations in the area from all sources not explicitly modeled by using a conservative background concentration of 5 ppb or 13 µg/m³. This fixed background concentration is considered conservative because it is added to the modeled impacts for every hour of the years included in the analysis. No changes were made as a result of this comment.

COMMENT #8: GRELC commented that the air program needed to extend its receptor grid to encompass a larger area. They state the air program appears to have limited its receptor grid to the area surrounding Magnitude 7 and does not appear to extend into the farther reaches of the county. They cite EPA guidance that in some cases two modeling runs may be needed. The first modeling run may include a moderate number of receptors in areas surrounding the source of concern and other areas of interest. Then a second modeling run could adjust the receptor grid to

include denser arrays of receptors in the areas showing potential for high concentrations and possible violations, as indicated by the results of the first model run.

RESPONSE: The air program started the air dispersion modeling analysis by assigning receptors spacing 50 meters around the Magnitude 7 property boundary. This is a very high-resolution for a receptor grid intended to capture the maximum concentrations around the facility. Dispersion modeling guidance, in general, recommends a receptor grid with a resolution of 100 meter spacing going out one kilometer away from the modeled source. Then, the receptor grid decreases in resolution as you go further away from the modeled source. For most modeling applications, a receptor grid extending 10 kilometers from the modeled source and with ending resolution of up to one kilometer is more than adequate to characterize SO₂ concentrations attributable to the modeled source(s). However, the air program used a high resolution receptor grid of 100 meters for the entire modeled area in order to capture the maximum concentrations in areas extending several kilometers away from the modeled sources. The receptor grid the air program used extends 9 kilometers from the south to the north and up to 6.5 kilometers from the east to the west. In addition, the air program made sure all receptors towards the edges of the receptor grid showed continuously decreasing concentrations when moving away from the modeled sources by adding extra receptors where necessary. The applied receptors showed that the concentration gradients from the modeled sources diminished when moving further away from them and did not warrant the need to extend the receptors into the farther reaches of the county. This ensured the modeling analysis properly captured all potentially violating areas in the county. No changes were made as a result of this comment.

COMMENT #9: GRELC commented that the air program should revise its model to include allowable emissions instead of actual emissions for Magnitude 7. They state EPA guidance indicates that for sources lacking CEMS data that simply dividing the annual emissions by the number of hours in the year is not an accurate representation of actual emissions for sources that experience emissions rate variability throughout the year and should not be used. They also state that modeling should be based on three years of data, but the air program only modeled one year or less in several of its modeling scenarios. They state in cases where insufficient data exists that EPA allows the use of allowable emissions in these cases because allowable emissions would provide a conservative estimate. They also state EPA guidance recommends the use of actual stack heights and an accurate layout of the facility for modeling runs intended for use in determining the extent of a violating area. They state the proposed recommendations are not clear as to whether the EPA guidance was followed with respect to the stack heights and facility layout criteria.

RESPONSE AND EXPLANATION OF CHANGE: As discussed in subsection A.1.2 of Appendix A of the proposed recommendations, the actual stack parameters are used in the modeling analysis. The air program used, to the extent possible, the actual layout of the facility including building parameters provided by facility and by the air program's staff who collected these data during a site visit to the facility.

The air program followed EPA guidance titled – *SO₂ Designations Modeling Technical Assistance Document* or TAD throughout the modeling analysis. The TAD specifically states that a minimum of the most recent 3 years of actual emissions should be used for designations. The guidance suggests the use of actual emissions instead of allowable emissions for designations. The guidance states that “designations are intended to address current actual air

quality (*i.e.*, modeling simulates a monitor), and, thus, are unlike attainment plan modeling, which must provide assurances that attainment will occur.” The air program used the best estimates of emissions data from Magnitude 7 that closely simulated the monitoring data. Since Magnitude 7 only resumed operations during the middle of 2018 and had only one full year, 2019, of operation, the air program created six modeling scenarios in order to better characterize emissions from Magnitude 7. This is explained in subsection A.1.2 of Appendix A of the proposed recommendations. The air program concluded that the highest 12-month rolling emissions total from September 2018 to August 2019 are the best estimates of emissions to characterize emissions from the Carbon Bake 2 at Magnitude 7, which is the most critical emission point impacting the maximum SO₂ concentrations in the area. The air program modeled three years (2017-2019) as recommended by the TAD using the 12-month rolling emissions from September 2018 to August 2019. It is a common and conservative practice to use the highest emission year as representative emissions for the three modeling years, as the air program did in the proposed recommendations. In response to this comment, the air program has attached to Appendix A all of Magnitude 7’s 12-month rolling emissions mass balance worksheets that they submitted through the end of 2019. This ensures the public has the information needed to evaluate and reproduce the emission rates included in the analysis.

COMMENT #10: GRELC commented that the air program failed to adequately characterize background concentrations in the modeling analysis. They state the air program ignored the impact of all sources other than the New Madrid Power Plant and Magnitude 7 and failed to address the meteorological conditions for the background levels of other source impacts as well. They cite EPA guidance which suggests that wind and pollution roses be used to assess the representativeness of the background concentrations for use in the model. They state the air program ignored these criteria in the guidance and instead utilized a fixed background concentration for all sources other than Magnitude 7 and the New Madrid Power Plant. They recommend the analysis for the background concentration be updated to include such an analysis.

RESPONSE: The purpose of the EPA guidance regarding an analysis of the wind and pollution roses when determining a background concentration is to allow for the removal of certain hours when explicitly modeled sources were likely impacting the SO₂ concentrations recorded at the monitor. The purpose of this is to not double-count emission impacts from explicitly modeled sources. Using wind and pollution roses to characterize the background concentration in any of the three monitors surrounding Magnitude 7 would have certainly resulted in double-counting emission impacts from Magnitude 7 and New Madrid Power Plant. For example, the AECI water tower monitor cannot be used since it is located between these two facilities. The graveyard monitor is heavily influenced by Magnitude 7. The west entrance monitor is also impacted by both of the two explicitly modeled sources. Therefore, as allowed by TAD, the air program used a regional site, Mark Twain State Park, which is located away from the area of interest but is impacted by similar natural and distant man-made sources. As stated in the responses to previous comments, the total combined SO₂ emissions in 2018 for all seven of the permitted sources in the county not explicitly modeled are less than one ton. The established background concentration fully and conservatively accounts for the impacts from all emissions sources not explicitly modeled with the potential to impact SO₂ concentrations in the area. No changes were made as a result of this comment.

COMMENT #11: GRELC commented that the air program failed to properly address weather

and geography in its analysis. They state the air program did not use site-specific or localized weather data in its analysis. They cite EPA guidance indicating the preference for site-specific meteorological data in these types of modeling analyses. They state the air program did not follow the guidance because it used upper air data from Springfield, which is hundreds of miles away and surface weather data from Cape Girardeau, which is approximately 50 miles away. They also state it was not clear if the model adequately characterized the unique geography in New Madrid County. They state that consideration of geography is particularly important when sources are located on and near the shoreline of bodies of water, such as the case in New Madrid County with the Mississippi River on its eastern boundary. They also state the proposed recommendations are unclear how the model incorporates the geographic characteristics of the area and the model should be updated to address them.

RESPONSE: EPA states in the memorandum titled – *Area Designations for the primary Sulfur Dioxide National Ambient Air Quality Standard – Round 4* that “we intend to evaluate meteorological data to help determine how weather conditions, including wind speed and direction, affect the plume of sources contributing to ambient SO₂ concentrations. This factor also can be assessed in the context of source-oriented dispersion modeling as recommended in the SO₂ NAAQS Designations Modeling TAD.” Based on this, the air program has addressed the meteorological aspect of the five factor analysis through the use of the air dispersion modeling. Specifically, the air program used the AERMET model to develop the meteorological data inputs to the AERMOD model. These meteorological data include but are not limited to wind speed, wind direction, and temperature. The air program did not use site specific meteorological data from Magnitude 7 for the reason stated in subsection A.1.2 of Appendix A of the proposed recommendations. This subsection states the wind speed sensor operated in the area did not meet the quality assurance criteria for regulatory dispersion modeling, which is why the air program elected not to use the onsite data. However, when developing the analysis, the air program did conduct a modeling test using the on-site meteorological data at Magnitude 7. This test utilizing the on-site meteorological data predicted a smaller area experiencing modeled violations than the violating areas predicted by the model with the meteorological data from the national weather service stations. This means the analysis was more conservative due to the use of the national weather service meteorological data.

Prior to running AERMET, the air program evaluated many surface and upper air service stations’ surface characteristics and compared them the surface characteristics in the modeled area as explained in subsection A.1.2 of Appendix A of the proposed recommendations. The air program concluded that upper air data from Springfield Airport and surface data from Cape Girardeau Regional Airport closely represent the surface conditions in the modeling area. Another reason to choose Cape Girardeau Regional Airport is that it is similarly situated with the Mississippi River on its eastern boundary, therefore the use of that surface data does take into account both the meteorology and the geographic characteristics of the area. Therefore, the modeling analysis in the proposed recommendations adequately characterized both the meteorology and the unique geography in New Madrid County. No changes were made as a result of this comment.

COMMENT #12: GRELC commented that due to the evolving situation concerning the COVID-19 pandemic, it has impacted the public’s ability to comment on proposed government actions. They requested the air program to extend the public comment period for at least an additional 45

days.

RESPONSE: The air program takes the concerns over the impacts of the pandemic seriously. When the governor closed the state office buildings to the public due to the pandemic on March 24, the public comment period for this action, which started on Feb. 24, 2020, had already been open for 30 days. In addition, the EPA is under a federal decree that orders them to finalize the SO₂ designations for all remaining areas in the country by December 31, 2020. According to EPA's guidance, they need revised state recommendations by May 1, 2020. This timeline will allow EPA sufficient time for review to incorporate and consider the information provided by states in time to meet the December deadline while also following their public notice process and the Clean Air Act requirement for 120-day letters. EPA is planning to release their 120-day letters for the SO₂ Round 4 Designations in August of this year. Those 120-day letters are expected to be followed by a federal public comment period allowing an additional chance for the public to provide comment on the designations. Due to these timing concerns, the air program would not be able to meet the May 1 deadline if we extended the public comment period deadline for the recommendations. This would hinder EPA's ability to review and consider the information in these recommendations before they are obligated to initiate designation actions for the remaining areas. Further, the federal designation process is expected to allow for an additional opportunity for public comment before the designations are finalized.

Since the opening of the public comment period for this action occurred multiple weeks before the social distancing guidelines associated with COVID-19 went into effect, and due to the timing concerns associated with EPA's requirement to issue these designations, the air program is not extending public comment period for this action. No changes were made as a result of this comment.