UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

DEC 2 0 2017

OFFICE OF THE
REGIONAL ADMINISTRATOR

The Honorable Eric Greitens
Governor of Missouri
201 W Capitol Avenue, Room 216
Jefferson City, Missouri 65101

Dear Governor Greitens:

We received Missouri's recommendation on air quality designations for the revised 2015 National Ambient Air Quality Standards for ozone in a letter dated September 30, 2016, and a subsequent letter dated September 22, 2017. This letter is to notify you of the U.S. Environmental Protection Agency's preliminary response to Missouri's recommendations and to inform you of our approach for completing designations for the revised ozone standards.

On October 1, 2015, the EPA lowered the primary 8-hour ozone standard from 0.075 parts per million to 0.070 ppm to provide increased protection of public health. The EPA revised the secondary 8-hour ozone standard, making it identical to the primary standard, to protect against welfare effects, including impacts on sensitive vegetation and forested ecosystems. Working closely with the states and tribes, the EPA is implementing the standards using a common sense approach that improves air quality and minimizes the burden on state and local governments. As part of this routine process, the EPA is working with the states to identify areas in the country that meet the standards and those that need to take steps to reduce ozone pollution.

As a first step in implementing the 2015 ozone standards, the EPA asked states to submit in the fall of 2016 their designation recommendations, including appropriate area boundaries. In a first round of designations, published on November 16, 2017, consistent with states' recommendations, the EPA designated as Attainment/Unclassifiable most of the country. In addition, the EPA designated three counties in the state of Washington as Unclassifiable, consistent with the state's recommendation. Further, consistent with EPA's "Policy for Establishing Separate Air Quality Designations for Areas of Indian Country" (December 20, 2011), the EPA designated two areas of Indian country as separate Attainment/Unclassifiable areas.

As required by the Clean Air Act, the EPA will designate an area as Nonattainment if there are certified, quality-assured air quality monitoring data showing a violation of the 2015 ozone standards, or if the EPA makes a determination that the area is contributing to a violation of the standard in a nearby area. Areas designated Attainment/Unclassifiable are not measuring or contributing to a violation of the standards.

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The EPA intends to designate Franklin, Jefferson, St. Charles and St. Louis Counties, and the city of St. Louis as Nonattainment, and to designate all other areas in the State not previously designated in November 2017 as Attainment/Unclassifiable. The enclosed Technical Support Document provides a detailed analysis to support our preliminary decisions for the areas of the State not previously designated. In order for the EPA to consider more current (i.e., 2015-2017) air quality data in the final designation decisions for any area, Missouri must submit certified, quality-assured 2015-2017 air quality monitoring data for the area to the EPA by February 28, 2018.

The EPA received Missouri's initial recommendation in a letter dated September 30, 2016. Missouri subsequently sent a letter on September 22, 2017, requesting the Agency not act on the state's initial recommendations. This request cited the most recent events pertaining to the 2015 ozone NAAQS designations, and MDNR's desire to reconsider its previous boundary recommendation. The original submission was based on 2013-2015 monitoring data; however, MDNR posted its revised recommendations for public notice and comment on November 6, 2017, potentially recommending utilizing monitoring data from the 2015-2017 period.

Based on this information and because Missouri has not yet submitted revised recommendations, the EPA is relying on the state's previous 2008 ozone nonattainment boundary, as well as the EPA's five-factor analysis of current data, to inform the Agency's intended designation for the 2015 ozone NAAQS.

The EPA will continue to work with state officials regarding the appropriate boundaries for the Nonattainment areas in Missouri. If Missouri has additional information, as noted in your September 22, 2017, request that you would like the EPA to consider, please submit it to us by February 28, 2018. Please submit additional information by sending to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0548, located at www.regulations.gov, and sending a copy to the EPA Region 7. The EPA will also make its preliminary designation decisions and supporting documentation available to the general public for review and comment. We will be announcing a 30-day public comment period shortly in the *Federal Register*. After considering additional information, we receive, the EPA plans to promulgate final ozone designations in spring of 2018.

The EPA is committed to working with the states and tribes to reduce ozone air pollution. We look forward to a continued dialogue with you and your staff as we work together to implement the 2015 ozone standards. Should you have any questions regarding this matter, please do not hesitate to contact me at (913) 551-7303 or have a member of your staff contact Rebecca Weber at (913) 551-7487.

Sincerely,

James B. Gulliford

cc: Carol Comer, Missouri Department of Natural Resources