STATE OF ARKANSAS
OFFICE OF THE GOVERNOR
State Capitol
Little Rock 72201

Mike Huckabee
Governor

June 23, 2000

Hon. Gregg A. Cooke
United States Environmental Protection Agency – Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Gregg:

In your letter of May 10, you asked that I recommend to you designations under the 8-hour ozone National Ambient Air Quality Standard (NAAQS) for the state of Arkansas. It is my recommendation that the entire state of Arkansas, with the exception of Crittenden County, be designated as "attainment/unclassifiable."

Although the monitoring data indicates Crittenden County should be designated as "nonattainment" we do not feel it is appropriate to make nonattainment designations under the 8-hour ozone standard at this time. As you know, pending litigation prohibits EPA from enforcing the 8-hour ozone standard. Designating areas as nonattainment is the first step in enforcing the 8-hour ozone standard and, therefore, should not occur at this time. Once litigation in this matter has concluded, I may file comments to supplement my recommendation.

In monitoring Arkansas ozone levels, our data indicates the ozone design value for Crittenden County is 91 ppb, as compared to the standard of 84 ppb. This value covers the years 1997-1999. The design value monitoring site is located in Marion, Arkansas and the monitor identification number is 05-035-0005. This information is included in the attached table. Crittenden County is part of the Memphis Metropolitan Statistical Area (MSA), which includes Shelby, Tipton, and Fayette Counties in Tennessee as well as DeSoto County in Mississippi. The ADEQ staff is currently involved in a multi-state effort to evaluate the causes of and solutions to the elevated regional ozone levels. This effort also included representatives from Tennessee, Mississippi, Memphis, EPA Region VI, and EPA Region IV.

Sincerely yours,

Mike Huckabee

MH:bk:mw

Encl.

AK enclosure

CRITTENDEN COUNTY OZONE MONITORING RESULTS Number of days with the maximum hourly average ozone concentration 125 ppb or higher				
Year	1997	1998	1999	Average
Number of days	1	0	2	1.0

CRITTENDEN COUNTY OZONE MONITORING RESULTS Daily Maximum 8-Hr Averages (ppb)						
Year	1st highest	2nd highest	3rd highest	4th highest	5th highest	6th highest
1997	100.39	99.00	97.06	91.97	88.71	86.89
1998	92.22	90.95	87.68	86.16	85.83	85.31
1999	105.21	100.14	96.67	95.91	95.59	93.50
AVERAGE				91.35		

The monitor is located in Marrion, Arkansas ID# 05-035-0005