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September 28, 2016

Mr. Robert A. Kaplan, Acting Regional Administrator U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard Chicago, Illinois 60604

RE: State of Minnesota Designation Recommendation for 2015 Ozone National Ambient Air Quality Standard

Dear Acting Regional Administrator Kaplan:

With this letter and the enclosed monitoring data, Governor Mark Dayton of Minnesota recommends that all the counties in the State of Minnesota be designated as attainment for the 2015 ozone National Ambient Air Quality Standard (NAAQS), published in the *Federal Register* on October 26, 2015, and effective December 28, 2015.

This recommendation does not include areas in the state that are under Tribal jurisdiction. Tribal governments may submit designation requests to the U.S. Environmental Protection Agency (EPA) under the Tribal Authority Rule of 1998 (63 FR 7254).

There is extensive scientific evidence that ozone causes and contributes to a wide range of adverse health impacts on both the respiratory and cardiovascular systems, especially in sensitive groups, such as the elderly, children, and people with asthma and chronic obstructive pulmonary disease. The evidence of ozone's impacts on human health is strong and we appreciate EPA's ongoing work to ensure that the NAAQS protect public health across the country.

Ozone levels in Minnesota have been steadily improving. Minnesota is an active participant in EPA's Ozone Advance Program to seek emissions reductions while in attainment of the NAAQS. The Minnesota Pollution Control Agency (MPCA) is also a founding member of Clean Air Minnesota, a public-private partnership that brings together representatives from the business, nonprofit, and government sectors in an effort to achieve measureable, voluntary emissions reductions to continue to improve Minnesota's air quality.

The data included in the enclosure to this letter demonstrates that no site in Minnesota exceeded either the primary or secondary eight-hour ozone NAAQS in the 2013-2015 monitoring period. Preliminary 2014-2016 monitoring results, based on data collected through August 31, 2016, indicate that ozone concentrations in Minnesota continue to be below the 2015 eight-hour ozone standard. Governor Dayton, therefore, is recommending that all the counties in Minnesota be designated as attainment for the 2015 ozone NAAQS.

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The Commissioner of the MPCA, duly authorized by the Governor of the State of Minnesota, is submitting this data and recommendation on behalf of Governor Dayton.

If you have any questions or comments about this submission, please contact Amanda Jarrett Smith of my staff at 651-757-2486 or amanda.smith@state.mn.us.

Sincerely,

John Linc Stine Commissioner

JLS/AJS:je

Enclosure

State of Minnesota designation recommendation for 2015 ozone National Ambient Air Quality Standard

Pursuant to Section 107(d) of the Clean Air Act, and following the revision of the National Ambient Air Quality Standard (NAAQS) for ozone, published in the *Federal Register* on October 26, 2015 and effective December 28, 2015, Governor Mark Dayton of Minnesota is recommending that all the counties in the state of Minnesota be designated as attainment for the ozone standard.

This recommendation does not include areas in the state that are under Tribal jurisdiction. Tribal governments may submit designation requests to the EPA under the Tribal Authority Rule of 1998 (63 FR 7254).

This designation recommendation is based on three consecutive years (2013-2015) of air sampling data collected at sixteen regulatory monitors around the state. To meet both the primary and secondary eight-hour ozone NAAQS, the three-year average of the annual fourth-highest daily maximum eight-hour average concentration of ozone must not exceed 70 parts per billion (ppb). The following data demonstrates that all monitors in Minnesota register concentrations below the 8-hour ozone standard for the 2013-2015 design value year. Preliminary 2014-2016 results, based on data collected through August 31, 2016, are also shown. No site in the state exceeded either the primary or secondary 8-hour standard for the 2013-2015 period. Quality-assured ozone monitoring data for Minnesota has been submitted and certified to the Air Quality System through 2015.

Monitored ozone design values

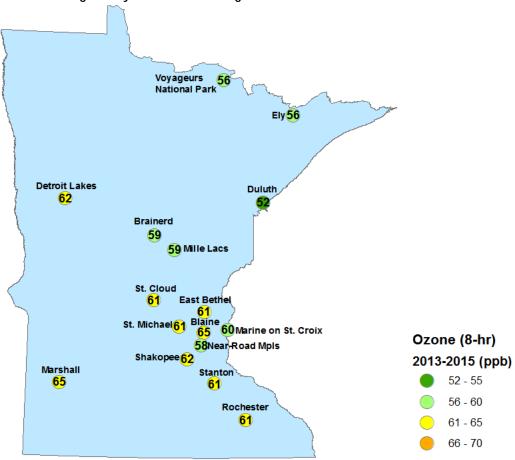
MPCA ID	AQS ID	Site Name	2013-2015 8-hour Ozone Design Value (ppb)	Preliminary ¹ 2014-2016 8-hour Ozone Design Value (ppb)
6012	27-003-1001	East Bethel	61	60
6010	27-003-1002	Blaine	65	63
2013	27-005-2013	Detroit Lakes	62	60
3204	27-035-3204	Brainerd	59	59
5302	27-049-5302	Stanton	61	61
962	27-053-0962	Minneapolis	58	56
7001	27-075-0005	Ely	56	56
4210	27-083-4210	Marshall	65	62
3051	27-095-3051	Mille Lacs	59	60
5008	27-109-5008	Rochester	61	61
Voya	27-137-0034	Voyageurs National Park	56	Not available ²
7550	27-137-7550	Duluth	52	53
505	27-139-0505	Shakopee	62	60
3052	27-145-3052	St. Cloud	61	60
6016	27-163-6016	Marine on St. Croix	60	59
3201	27-171-3201	St. Michael	61	61

¹Preliminary 2014-2016 design values are based on monitoring data collected through August 31, 2016. The ozone monitoring season in Minnesota runs through October 31.

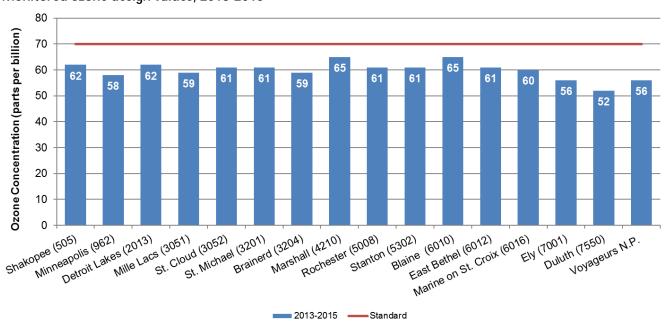
²The National Park Service owns and operates the ozone monitor at Voyageurs National Park. Preliminary data is not available at this time.

Locations of Minnesota's ozone regulatory monitors and their 2013-2015 ozone design values can be seen in the following map and chart.

Minnesota regulatory ozone monitoring sites 2013-2015

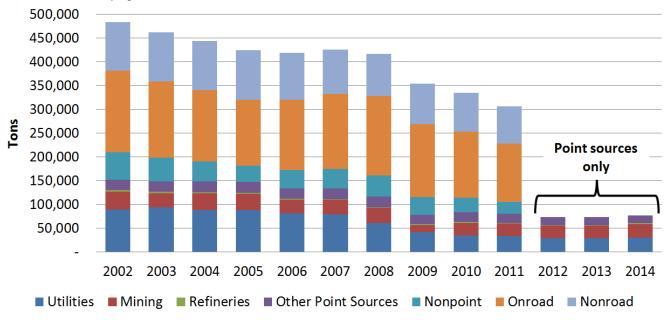


Monitored ozone design values, 2013-2015

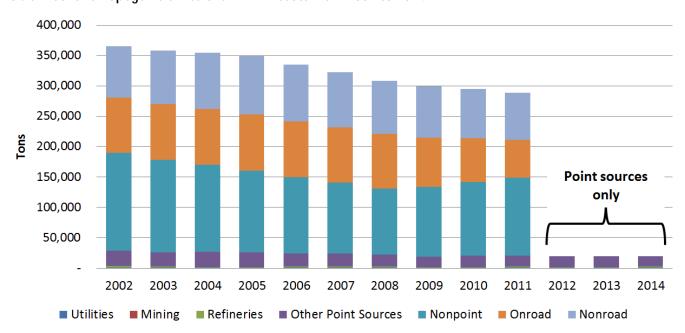


Emissions of ozone precursor pollutants – nitrogen oxides (NO_X) and volatile organic compounds (VOCs) – have been decreasing in recent years, indicating that Minnesota will continue to attain the 2015 ozone standard.

NO_X annual anthropogenic emissions in Minnesota from 2002 to 2014



VOC annual anthropogenic emissions in Minnesota from 2002 to 2014



For these reasons, Governor Dayton recommends that all the counties in Minnesota be designated attainment for the 2015 ozone NAAQS. The Commissioner of the Minnesota Pollution Control Agency, duly authorized by the Governor of the State of Minnesota, is submitting this data and recommendation on behalf of Governor Dayton.