



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8P-AR

Tom Livers, Director
Montana Department of Environmental Quality
P.O Box 200901
Helena, Montana 59620-0901

Re: Missoula PM₁₀ Limited Maintenance Plan; Transportation Conformity Adequacy

Dear Mr. Livers,

The EPA has reviewed the Missoula PM₁₀ Clean Air Act section 175A(a) Limited Maintenance Plan (LMP)-State Implementation Plan (SIP) revision that was submitted to the EPA by a letter dated August 1, 2016 from Governor Steve Bullock.

Based on our review, we have found the Missoula PM₁₀ LMP adequate for transportation conformity purposes. Our finding considered the Missoula PM₁₀ area's ability to meet the criteria for a PM₁₀ LMP¹ and as meeting the applicable procedures and criteria for adequacy pursuant to section 93.118 of the EPA's Transportation Conformity Rule (40 CFR part 93, Subpart A). We will announce this adequacy finding by publishing a Notice in the Federal Register; the adequacy finding will then become federally-effective 15 days after the publication of the Notice.

As part of our adequacy review, we announced receipt of the Missoula PM₁₀ LMP and posted an announcement of availability on the EPA's Office of Transportation and Air Quality website at: <https://www.epa.gov/state-and-local-transportation/adequacy-review-state-implementation-plan-sip-submissions-conformity>. We requested public comments by May 30, 2018. We did not receive any comments. In addition, we also reviewed the Governor's SIP revision submittal for any comments about the maintenance plan that may have been submitted during the public hearing process. We note the Administrative Record states there were no comments from the public and that the EPA's comments of December 17, 2014 were addressed.

The EPA notes that for the Missoula PM₁₀ area, the prior EPA-approved motor vehicle emission budget (MVEB) was 16,119 pounds per day of PM₁₀ for 2001.² With respect to this 2001 MVEB, once our transportation conformity adequacy finding Federal Register Notice is effective, no regional emissions analysis would be required for a conformity determination for the Missoula County-City Metropolitan Planning Organization's (MPO) Regional Transportation Plan (RTP) or Transportation Improvement Program (TIP). This is permitted under the PM₁₀ LMP Option as MVEBs are treated as essentially not constraining because it is unreasonable to expect that qualifying areas would experience so much growth that a violation of the PM₁₀ National Ambient Air Quality Standard would result.

¹ EPA Limited Maintenance Plan Option Policy for Moderate PM₁₀ Nonattainment Areas dated August 9, 2001.

² The PM₁₀ MVEB was originally derived from the motor vehicle source category of the emissions inventory for the Missoula PM₁₀ nonattainment area; see the EPA's SIP approvals of December 13, 1994 (59 FR 64133) and August 30, 1995 (60 FR 45051.)

We note, however, that with our adequacy finding certain aspects of a transportation conformity determination will still be required for the Missoula County-City MPO's RTP, TIP and projects. Specifically, the RTP and TIP will have to demonstrate that they meet the requirements for consultation (40 CFR 93.105), are fiscally constrained (40 CFR 93.108), and meet the criteria for timely implementation of any applicable Transportation Control Measures (40 CFR 93.112 and 40 CFR 93.113, respectively). In addition, projects in PM₁₀ LMP areas are required to address the applicable criteria for localized PM₁₀ hot spot analyses to satisfy "project level" conformity determinations (40 CFR 93.116 and 40 CFR 93.123).

This adequacy finding affects future PM₁₀ RTP and TIP conformity determinations as prepared and approved by the Missoula County-City MPO, the Montana Department of Transportation, the Federal Highway Administration, and Federal Transit Administration.

Please note that this adequacy finding is separate from the EPA's subsequent rulemaking action on the Missoula PM₁₀ LMP SIP revision and should not be used to prejudge the EPA's approval or disapproval of the SIP revision.

If there are any questions, please contact Tim Russ, of my staff, at (303) 312-6479.

Sincerely,

7/23/2018

X Monica Mathews-Morales

Signed by: MONICA MATHEWS-MORALES
Monica Mathews-Morales
Director, Air Program
Office of Partnerships and Regulatory Assistance

cc: Missoula County-City MPO