rec'd 8/7/03 LD

ARTD w/ attachments

cc: RA/DRA Ltr only

STATE OF MISSOURI

Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.state.mo.us

AUG - 1 2003

Mr. James B. Gulliford
Regional Administrator
U.S. EPA, Region VII
901 North Fifth Street
Kansas City, KS 66101

Dear Mr. Gulliford:

This letter is in response to your December 6, 2002, letter to Governor Holden requesting the state submit an updated, revised, or new recommendation on nonattainment area boundaries under the 8-hour ozone standard. The designation recommendation and documentation were originally due by April 15, 2003. However, the U.S. Environmental Protection Agency (EPA) later extended the deadline to July 15, 2003. Region VII graciously agreed to allow Missouri some additional time past July 15 to accommodate the schedule of the Missouri Air Conservation Commission and enable more opportunity for public participation. Governor Holden has requested that I, as his designee, forward this recommendation to you.

EPA has promulgated a new 8-hour ozone national ambient air quality standard and has advised states that it is obligated by the Clean Air Act and the Transportation Equity Act for the 21st Century to designate areas throughout the country as attainment/unclassifiable or nonattainment for the standard. Section 107(d)(1) of the Clean Air Act provides each state governor the opportunity to recommend designations including appropriate boundaries to the EPA. It is my understanding that if EPA determines that a modification to a recommendation is necessary, EPA will notify the state no later than October 15, 2003, to provide an opportunity for states to demonstrate why the EPA's modification is not appropriate.

At this time, The State of Missouri is recommending that the counties of Clay, Platte, Jackson, northern portion of Cass, Jefferson, Franklin, St. Charles, and St. Louis along with the City of St. Louis be designated as nonattainment. The State recommends that the remainder of the state of Missouri be designated as attainment/unclassifiable. Enclosed with this letter is a table listing all 114 counties in Missouri along with their corresponding recommended classification. Also enclosed with this letter is a technical review of the factors listed in the EPA guidance document.

Thank you for this opportunity and your understanding of the process we used in developing this recommendation. We look forward to working closely with you in the coming months as we follow a similar process on the fine particulate standard. Should you have any questions regarding this letter or the technical support document enclosed, please contact Ms. Leanne J. Tippett, Director, Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102, or call (573) 751-4817.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

Stephen Mahfood
Director

SM:rml

Enclosures

County	Recommended Classification
ADAIR	Attainment/unclassifiable
ANDREW	Attainment/unclassifiable
ATCHISON	Attainment/unclassifiable
AUDRAIN	Attainment/unclassifiable
BARRY	Attainment/unclassifiable
BARTON	Attainment/unclassifiable
BATES T	Attainment/unclassifiable
BENTON	Attainment/unclassifiable
BOLLINGER	Attainment/unclassifiable
BOONE	Attainment/unclassifiable
BUCHANAN	Attainment/unclassifiable
BUTLER	Attainment/unclassifiable
CALDWELL	Attainment/unclassifiable
CALLAWAY	Attainment/unclassifiable
CAMDEN	Attainment/unclassifiable
CAPE GIRARDEAU	Attainment/unclassifiable
CARROLL	Attainment/unclassifiable
CARTER	Attainment/unclassifiable
Northern portion of CASS	Nonattainment
The remaining CASS	Attainment/unclassifiable
CEDAR	Attainment/unclassifiable
CHARITON	Attainment/unclassifiable
CHRISTIAN	Attainment/unclassifiable
CLARK	Attainment/unclassifiable
CLAY	Nonattainment
CLINTON	Attainment/unclassifiable
COLE	Attainment/unclassifiable
COOPER	Attainment/unclassifiable
CRAWFORD	Attainment/unclassifiable
DADE	Attainment/unclassifiable
DALLAS	Attainment/unclassifiable
DAVIESS	Attainment/unclassifiable
DeKALB	Attainment/unclassifiable
DENT	Attainment/unclassifiable
DOUGLAS	Attainment/unclassifiable
DUNKLIN	Attainment/unclassifiable
FRANKLIN	Nonattainment
GASCONADE	Attainment/unclassifiable
GENTRY	Attainment/unclassifiable
GREENE	Attainment/unclassifiable
GRUNDY	Attainment/unclassifiable

HARRISON	Attainment/unclassifiable
HENRY	Attainment/unclassifiable
HICKORY	Attainment/unclassifiable
HOLT	Attainment/unclassifiable
HOWARD	Attainment/unclassifiable
HOWELL	Attainment/unclassifiable
IRON	Attainment/unclassifiable
JACKSON	Nonattainment
JASPER	Attainment/unclassifiable
JEFFERSON	Nonattainment
JOHNSON	Attainment/unclassifiable
KNOX	Attainment/unclassifiable
LACLEDE	Attainment/unclassifiable
LAFAYETTE	Attainment/unclassifiable
LAWRENCE	Attainment/unclassifiable
LEWIS	Attainment/unclassifiable
LINCOLN	Attainment/unclassifiable
LINN T(14)	Attainment/unclassifiable
LIVINGSTON	Attainment/unclassifiable
McDONALD	Attainment/unclassifiable
MACON	Attainment/unclassifiable
MADISON	Attainment/unclassifiable
MARIES	Attainment/unclassifiable
MARION	Attainment/unclassifiable
MERCER	Attainment/unclassifiable
MILLER	Attainment/unclassifiable
MISSISSIPPI	Attainment/unclassifiable
MONITEAU	Attainment/unclassifiable
MONROE	Attainment/unclassifiable
MONTGOMERY	Attainment/unclassifiable
MORGAN	Attainment/unclassifiable
NEW MADRID	Attainment/unclassifiable
NEWTON	Attainment/unclassifiable
NODAWAY	Attainment/unclassifiable
OREGON	Attainment/unclassifiable
OSAGE	Attainment/unclassifiable
OZARK	Attainment/unclassifiable
PEMISCOT	Attainment/unclassifiable
PERRY	Attainment/unclassifiable
PETTIS	Attainment/unclassifiable
PHELPS	Attainment/unclassifiable
PIKE	Attainment/unclassifiable
PLATTE	Nonattainment
POLK	Attainment/unclassifiable
PULASKI	Attainment/unclassifiable

PUTNAM	Attainment/unclassifiable
RALLS	Attainment/unclassifiable
RANDOLPH	Attainment/unclassifiable
RAY	Attainment/unclassifiable
REYNOLDS	Attainment/unclassifiable
RIPLEY	Attainment/unclassifiable
ST. CHARLES	Nonattainment
ST. CLAIR	Attainment/unclassifiable
ST. FRANCOIS	Attainment/unclassifiable
STE. GENEVIEVE	Attainment/unclassifiable
ST. LOUIS	Nonattainment
SALINE	Attainment/unclassifiable
SCHUYLER	Attainment/unclassifiable
SCOTLAND	Attainment/unclassifiable
SCOTT	Attainment/unclassifiable
SHANNON	Attainment/unclassifiable
SHELBY	Attainment/unclassifiable
STODDARD	Attainment/unclassifiable
STONE	Attainment/unclassifiable
SULLIVAN	Attainment/unclassifiable
TANEY	Attainment/unclassifiable
TEXAS	Attainment/unclassifiable
VERNON	Attainment/unclassifiable
WARREN	Attainment/unclassifiable
WASHINGTON	Attainment/unclassifiable
WAYNE	Attainment/unclassifiable
WEBSTER	Attainment/unclassifiable
WORTH	Attainment/unclassifiable
WRIGHT	Attainment/unclassifiable
ST. LOUIS CITY	Nonattainment