



Minnesota Pollution Control Agency

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May 22, 2012

Ms. Laura Bunte
Ozone Advance
Office of Air Quality Planning Standards, C304-01
4930 Old Page Road
Durham, North Carolina 27703

Dear Ms. Bunte:

The State of Minnesota would like to participate in the Ozone Advance program. The Minnesota Pollution Control Agency (MPCA) wishes to join this partnership with the U.S. Environmental Protection Agency (EPA) to preserve Minnesota's attainment status and improve air quality in the state. The State of Minnesota meets the program eligibility criteria, for example:

- (1) The entire State of Minnesota currently is in attainment with the eight hour ozone National Ambient Air Quality Standard (NAAQS) promulgated in 1997. On December 9, 2011, EPA sent a letter to the Governor of Minnesota stating EPA's intent to designate the entire State of Minnesota as unclassifiable/attainment for the 2008 ozone standard.
- (2) The MPCA operates 15 ozone monitors within the state. Data from these monitors is available at the MPCA's air quality index website¹, and is submitted quarterly to EPA's Air Quality System with annual certification.
- (3) Existing emissions inventory reporting requirements have been met.

Because parts of Minnesota are near nonattainment for particular matter less than 2.5 micrometers (PM_{2.5}), we will combine our efforts into one multi-pollutant program that addresses both ozone and PM_{2.5} as recommended in the Ozone Advance final guidance. Given that the likelihood of nonattainment is greater with the PM_{2.5} standard, we intend to prioritize our reduction activities to address PM_{2.5} and nitrogen oxides in our multi-pollutant approach. Should a PM_{2.5} Advance program become available, Minnesota will likely also participate in that program.

We understand that our efforts under Ozone Advance may benefit the State of Minnesota by potentially:

- Reducing air pollution in terms of ozone and PM_{2.5} as well as other air pollutants.
- Ensuring continued healthy ozone and PM_{2.5} levels.
- Maintaining the ozone and PM_{2.5} NAAQS.
- Helping avoid violations of the ozone and PM_{2.5} NAAQS that could lead to a future nonattainment designation.
- Increasing public awareness about ground-level ozone and PM_{2.5} as air pollutants.
- Targeting limited resources toward actions to address ozone and PM_{2.5} problems quickly.

¹ <http://aqi.pca.state.mn.us/index.cfm>

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The MPCA has established a stakeholders group to identify actions to help Minnesota meet these air quality goals. This process is known as Minnesota's Clean Air Dialogue and has already met twice.² At their second meeting on May 11, 2012, the Clean Air Dialogue working group by consensus supported Minnesota's participation in Ozone Advance, and committed to work with the MPCA to develop a path forward.

This request for the participation of Minnesota in the Ozone Advance program does not include areas that are under tribal jurisdiction. However, the MPCA is fully committed to working with tribal governments, and any affected local governments, to effectively and efficiently meet the goals of the Advance program.

Our goal is to work in coordination with the group of stakeholders and the public to proactively implement measures and programs to reduce ozone and PM_{2.5} in the State of Minnesota in the near term. Participation in Ozone Advance will help guide those discussions and result in better air quality for all Minnesotans.

If you have questions concerning Minnesota's participation in Ozone Advance, please contact Catherine Neuschler at 651-757-2607 or catherine.neuschler@state.mn.us.

Sincerely,



John Linc Stine
Commissioner

JLS/CN:jab

cc: Steve Rosenthal, EPA Region 5

² Information on the stakeholder group, including members and meeting materials, can be found at: <http://www.environmental-initiative.org/projects/minnesotas-clean-air-dialogue>