



STATE OF MISSISSIPPI
OFFICE OF THE GOVERNOR

HALEY BARBOUR
GOVERNOR

October 27, 2011

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U.S. Environmental Protection Agency
Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Re: Revised Attainment/Nonattainment Recommendations for the 2008 Ozone Standard

Dear Ms. Keyes Fleming:

In accordance with the Federal Clean Air Act, I am writing to provide a revision to State of Mississippi's recommendations that were made on March 3, 2009 for the designation of attainment, nonattainment, or unclassifiable in accordance with the Environmental Protection Agency's (EPA's) 2008 national ambient air quality standard for ground-level ozone. The air quality has improved considerably in all counties of the state and currently all counties in Mississippi are attaining the ozone standard. The monitoring results are better than when I took office eight years ago and are better than they were only two years ago when the .075 ppm standard was finalized.

The air quality data for 2008 through 2010 indicate ground-level ozone has exceeded the standard in only one county – Harrison County. However, preliminary data for 2011 indicates that Harrison County will meet the standard. The Mississippi Department of Environmental Quality (MDEQ) will certify the 2011 data as soon as possible so that it can be used by EPA to make designations.

Mississippi recommends that DeSoto County not be included in the Memphis, Tennessee, nonattainment area. As was shown in MDEQ's technical analysis that was attached to my letter on March 3, 2009, DeSoto County has a significantly lower population density than Shelby County, where Memphis is located. DeSoto County has only a fraction of the emissions of Shelby County. Also, most days in which 8-hour ozone levels were measured in DeSoto County above the standard of 75 ppb, back trajectory modeling showed that the air was transported into DeSoto County from the north, including Shelby County.

In addition, the analysis performed by EPA for the Clean Air Interstate Rule and the subsequent Cross State Air Pollution Rule did not find contribution from Mississippi to

Shelby or Crittenden Counties. This is consistent with ozone modeling performed in the past that has also shown that emissions from DeSoto County do not significantly contribute to ozone concentrations in the Memphis area. This information is presented in full in a Technical Support Document that will be submitted in November.

Therefore, based on ozone air quality data for 2009 through 2011, all Mississippi counties should be designated as being in attainment. If you have any questions, please contact Ms. Trudy Fisher, Executive Director of the MDEQ, at 601-961-5000.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley Barbour", with a horizontal line extending to the right from the end of the signature.

Haley Barbour

cc: Ms. Trudy Fisher, Executive Director, MDEQ