

July 1, 2003

J. I. Palmer, Jr.  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

Dear Mr. Palmer:

In accordance with the Federal Clean Air Act, I am hereby providing my recommendations for designations with regard to attainment or non-attainment of EPA's new 8-hour ambient air quality standard for ozone in the state of Mississippi.

During the most recent three years of data (2000-2002), violations of the standard occurred in only one Mississippi County, DeSoto County. According to the guidance you provided, the Environmental Protection Agency (EPA) will designate the metropolitan statistical area (MSA) in which DeSoto County is located as one non-attainment area, absent a recommendation from the state to the contrary. DeSoto County or a portion of the County is located in the Memphis, TN MSA.

I recommend that DeSoto County be a separate non-attainment area from the Memphis area should air quality trends continue as current data indicates. However, should the 2001-2003 data show ground level ozone in DeSoto County below the standard, then DeSoto County should be designated attainment. I will discuss several reasons for this recommendation and refer you to the enclosed technical analysis by the Mississippi Department of Environmental Quality (MDEQ) for the rest of the technical justification for this request.

As is shown in MDEQ's technical analysis, 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 Tennessee's Shelby County. DEQ's technical analysis shows that on the days in which 8-

hour ozone levels were measured in DeSoto County above the standard of 84 ppb, the air had been transported into DeSoto County from Shelby County and points north.

Further the preliminary results of the collaborative Arkansas-Tennessee-Mississippi Ozone Study (ATMOS) and the resulting ozone model show that previous EPA-mandated emissions reductions will result in DeSoto County regaining attainment of the 8-hour ozone standard by 2007 without additional controls in DeSoto County. The remainder of the MSA, including Memphis, will have to go to much greater lengths to meet the standard. Including DeSoto County in the Memphis non-attainment area will place undue burdens on DeSoto while doing nothing to help Memphis attain the standard.

Emission reductions in DeSoto County will not help Memphis. DEQ's analyses show that if manmade emissions of ozone precursors were totally eliminated in DeSoto County, ozone levels in Shelby County would not be measurably reduced.

The remainder of the counties in Mississippi should be designated attainment based upon ozone air quality data for 2000-2002.

Very truly yours,

Ronnie Musgrove