

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

Dr. Al Armendariz, Administrator
US EPA Region 6 (6-RA)
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733

RE: State of Louisiana
Recommendations for Designation
2010 NO₂ National Ambient Air Quality Standards (NAAQS)

Dear Dr. Armendariz:

In accordance with Section 1107(d) of the Clean Air Act Amendments of 1990, the state of Louisiana is pleased to provide its recommendations for area designations for the 2010 NO₂ NAAQS.

The unavailability of any timely implementation guidance from EPA complicated the recommendation development process and suggests a certain negligence and lack of foresight. The federal rule was finalized on April 12, 2010 and no implementation guidance has been issued by EPA. Additionally, your November 24, 2010 letter to Governor Jindal indicates EPA's preference to drive the entire state of Louisiana into the designation of "unclassifiable". This approach neglects the exemplary efforts put forth by monitored areas of our state to maintain NO₂ values that are one half to one third of the value of the new standard. As such, we have developed a prudent and logical approach to the recommendations under this standard. To do anything to the contrary would be a disservice to the residents of our state.

Using information taken from the new NO₂ rules that were published on January 22, 2010, we have developed the following recommendations for area designations:

- For Parishes that have monitored NO₂ values that are below both the 53ppb annual average and 100ppb 1-hour standard, and where no near-road monitoring is required, we recommend a designation of "attainment".
- For Parishes that are not monitored, we recommend a designation of "unclassifiable".
- For Parishes that have monitored NO₂ values that are below both the 53 ppb annual average and 100 ppb 1-hour standard, and where near-road monitoring is required, we recommend a designation of "attainment" for the Parish *except* for that area where near-road monitoring will be required which is recommended as "unclassifiable".

Delineation of the near-road “unclassifiable” areas is made according to the EPA monitoring rule’s sighting requirements. The EPA monitoring rule requires that two (2) new NO₂ monitors be added to our existing network of nine (9) monitoring sites; one near-road monitor added in the Baton Rouge CBSA and one in the New Orleans CBSA. DEQ has collaborated with the Department of Transportation and Development (DOTD) to evaluate the highway segments with the highest vehicular traffic counts. Linear boundaries along stretches of highway where traffic counts are the highest were drawn. The highest traffic count location was used as a starting point and then the boundary moved in each direction along the highway until reaching the first traffic monitored location with a count of less than 50% of the highest location. Boundary widths were based upon the rule’s premise that concentrations fall off very quickly at more than 50 meters from the edge of the traffic lane.

Based on a review of the quality-assured NO₂ monitoring data for the period 2008-2010, Louisiana recommends the following designations:

- Designation of “attainment” for 5 monitored parishes in the state - Iberville, Ascension, Livingston, Calcasieu and West Baton Rouge.
- Designation of “attainment” for 2 monitored parishes in the state with “unclassifiable” areas denoted within their boundaries
 - East Baton Rouge with the “unclassifiable” area extending along I-10 from mile marker 155 to marker 164, along I-12 from mile marker 0 to marker 5 and to a distance no greater than 50 meters from the outer edge of the East and West travel lanes, and
 - Jefferson with the “unclassifiable” area extending along I-10 from mile marker 224 to the Orleans Parish line and to a distance no greater than 50 meters from the outer edge of the East and West travel lanes.
- A designation of “unclassifiable” for the remaining parishes as there is no monitored data for them.

Attached please find a complete list of the 64 Louisiana Parishes by Air Quality Control Region and the recommended designations.

If you have any questions, please contact Tegan Treadaway, Administrator of the Air Permits Division, Office of Environmental Services at 225-219-3408

Sincerely,



Peggy M. Hatch
Secretary

c: Thomas Diggs, EPA
Guy Donaldson, EPA

PMH/mdv

Attachment

State of Louisiana

2010 NO₂ Designation Recommendations

AQCR 019: Monroe-El Dorado Interstate

Designated Area	Recommended Designation
• Caldwell Parish	Unclassifiable
• Catahoula Parish	Unclassifiable
• Concordia Parish	Unclassifiable
• East Carroll Parish	Unclassifiable
• Franklin Parish	Unclassifiable
• Grant Parish	Unclassifiable
• La Salle Parish	Unclassifiable
• Madison Parish	Unclassifiable
• Ouachita Parish	Unclassifiable
• Richland Parish	Unclassifiable
• Tensas Parish	Unclassifiable
• Union Parish	Unclassifiable
• West Carroll Parish	Unclassifiable

AQCR 022: Shreveport-Texarkana-Tyler Interstate

Designated Area	Recommended Designation
• Avoyelles Parish	Unclassifiable
• Bienville Parish	Unclassifiable
• Bossier Parish	Unclassifiable
• Caddo Parish	Unclassifiable
• Claiborne Parish	Unclassifiable
• DeSoto Parish	Unclassifiable
• Jackson Parish	Unclassifiable
• Lincoln Parish	Unclassifiable
• Natchitoches Parish	Unclassifiable
• Rapides Parish	Unclassifiable
• Red River Parish	Unclassifiable
• Sabine Parish	Unclassifiable
• Vernon Parish	Unclassifiable
• Webster Parish	Unclassifiable
• Winn Parish	Unclassifiable

State of Louisiana

2010 NO₂ Designation Recommendations

AQCR 106: S. Louisiana-SE Texas Interstate

Designated Area	Recommended Designation
• Acadia Parish	Unclassifiable
• Allen Parish	Unclassifiable
• Ascension Parish	Attainment
• Assumption Parish	Unclassifiable
• Beauregard Parish	Unclassifiable
• Calcasieu Parish	Attainment
• Cameron Parish	Unclassifiable
• East Baton Rouge Parish	Attainment (except for near road)
○ I-10 from Mile 155 to 164, 50 meters from edge	Unclassifiable (delineation for near road)
○ I-12 from Mile 0 to 5, 50 meters from edge	Unclassifiable (delineation for near road)
• East Feliciana Parish	Unclassifiable
• Evangeline Parish	Unclassifiable
• Iberia Parish	Unclassifiable
• Iberville Parish	Attainment
• Jefferson Davis Parish	Unclassifiable
• Jefferson Parish	Attainment (except for near road)
I-10 from Mile 224 to Orleans Parish Line, 50 meters from edge	Unclassifiable (delineation for near road)
• Lafayette Parish	Unclassifiable
• Lafourche Parish	Unclassifiable
• Livingston Parish	Attainment
• Orleans Parish	Unclassifiable
I-10 from Jefferson Parish Line to Mile 237, 50 meters from edge	Unclassifiable (delineation for near road)
• Plaquemines Parish	Unclassifiable
• Pointe Coupee Parish	Unclassifiable
• St. Bernard Parish	Unclassifiable
• St. Charles Parish	Unclassifiable
• St. Helena Parish	Unclassifiable
• St. James Parish	Unclassifiable
• St. John the Baptist Parish	Unclassifiable
• St. Landry Parish	Unclassifiable
• St. Martin Parish	Unclassifiable
• St. Mary Parish	Unclassifiable
• St. Tammany Parish	Unclassifiable
• Tangipahoa Parish	Unclassifiable
• Terrebonne Parish	Unclassifiable
• Vermilion Parish	Unclassifiable
• Washington Parish	Unclassifiable
• West Baton Rouge Parish	Attainment
• West Feliciana Parish	Unclassifiable