

**PROPOSAL TO REVISE INTERSTATE TRANSPORT IMPLEMENTATION PLAN OF
THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT, AIR
POLLUTION CONTROL DIVISION**

IN THE MATTER OF PROPOSED REVISIONS TO COLORADO'S IMPLEMENTATION
PLAN TO MEET THE REQUIREMENTS OF CLEAN AIR ACT SECTION 110 (A)(2)(D)(I)-
INTERSTATE TRANSPORT REGARDING THE NATIONAL AMBIENT AIR QUALITY
STANDARDS FOR 8-HOUR OZONE

The Colorado Department of Public Health and Environment, Air Pollution Control Division ("Division"), through the Office of the Attorney General, hereby proposes that the Commission adopt revisions to the Interstate Transport Implementation Plan, as described below.

The Division originally proposed these revisions as part of the original Ozone Action Plan offered together with the Regional Air Quality Council. The Division then asked the Commission to bifurcate the hearing so that the Interstate Transport Plan would be heard and considered separately. While this revision is limited to transport issues pertaining to ground level ozone, the revisions would affect Interstate Transport Plan, a plan that applies State-wide, addressing pollution issues beyond ozone. EPA noted that the Interstate Transport Plan does not belong in the Ozone Action Plan and the Division, upon further consideration, agrees.

The Division offers this proposed SIP revision in conjunction with the proposed 8-hour Ozone Action Plan for the Denver and the North Front Range. The Division intends that the Commission adopt this proposed Interstate Transport SIP revision as well as the Division's proposed Ozone Action Plan during the December meeting so that both plans may follow the same schedule for Legislative review and subsequent submittal to EPA.

In February of 2006, the Air Quality Control Commission adopted an Interstate Transport Plan addressing both the 8-hour ozone NAAQS and for PM-2.5 NAAQS. This SIP document was transmitted to EPA following legislative review and approval in June of 2007. EPA has since provided informal comment identifying deficiencies in the SIP.

The Division proposes this revision to accomplish two important objectives. First, the proposal provides updates and addresses technical concerns that EPA has identified in its review of the Commission adopted Colorado Interstate Transport SIP with regard to the 1997 8-hour ozone NAAQS, 0.08 ppm. Second, because the Interstate Transport plan addresses the interstate transport of air pollutants and applies to all areas of any state, adopting this plan provides a timely and important tool to address attainment and maintenance of the 8-hour ozone NAAQS.

Therefore, the Division respectfully requests that the Commission adopt the revisions to the Interstate Transport Plan, as proposed.

DATED this 25th day of November 2008.

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CERTIFICATE OF SERVICE

I hereby certify on this 25th day of November, 2008, a true and correct copy of the foregoing Interstate Transport SIP Revision Proposal was served on the following via electronic mail:

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A handwritten signature in cursive script, appearing to read "Linda Miller".

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