



730 NORTH BOULEVARD, BATON ROUGE, LOUISIANA 70802 • TELEPHONE (225) 387-3205 FAX (225) 344-5502

September 23, 2011

Mr. Guy Donaldson
Chief, Air Planning Section
U. S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Attention: Docket ID No. EPA-R06-OAR-2010-0776

RE: Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes; Louisiana; Baton Rouge Ozone Nonattainment Area: Redesignation to Attainment for the 1997 8-Hour Ozone Standard

The Louisiana Mid-Continent Oil and Gas Association (LMOGA) appreciates the opportunity to comment on the proposed *Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes; Louisiana; Baton Rouge Ozone Nonattainment Area: Redesignation to Attainment for the 1997 8-Hour Ozone Standard* which appeared in the August 30, 2011 Federal Register (Docket ID No. EPA-R06-OAR-2010-0776 – 76FR53853). LMOGA is an industry trade association representing individuals and companies who together produce, transport, refine and market crude oil, natural gas and petroleum products in Louisiana. Several LMOGA members, including two refineries, operate in the Baton Rouge area.

LMOGA strongly supports the proposed actions. LMOGA members have spent tens of millions of dollars on control equipment to reduce ozone precursors since this standard was adopted. LMOGA members and staff have worked closely with the Louisiana Department of Environmental Quality during the Implementation Plan development. The monitoring data clearly shows the area has attained, and continues to attain, the 1997 8-hour ozone standard and the area should be reclassified.

Once again, LMOGA appreciates the opportunity to submit these comments.

Sincerely,

Richard T. Metcalf
Director of Environmental Affairs