



JOHN S. ANDERSON, M.D.
EXECUTIVE OFFICER AND SECRETARY

State of Montana State Board of Health

HELENA, MONTANA

March 29, 1967

Mr. Barry D. Nolan
3120 Green Terrace Drive
Billings, Montana 59102

Dear Mr. Nolan:

We are happy to learn of your acceptance of the Governor's request to serve on the Air Pollution Control Advisory Council created by the 1967 Legislative Session. In line with the intent of the Legislature, we have prepared a set of proposed Ambient Air Quality Standards that are needed in Montana to form the base upon which emission standards and all other air pollution control procedures will be built.

As provided in Section 14 of the Clean Air Act of Montana, the Council is to be afforded not less than 30 days prior to the publication of the proposed standards to comment thereon. The Board has established a target date of May 26, 1967 as the hearing date. The twenty days preceding the hearing date are required, also, under Section 14 whereby--"notice shall be given by public advertisement not less than 20 or more than 30 days prior to the date set for such hearing". The date of May 26 allows the Board approximately a week after the hearing to correlate all of the information heard and submitted before reaching the deadline on June 2, the end of the 90 day period.

Since you may wish to meet with your colleagues on the Council prior to May 4, 1967 which should be the last day of the 30 day period provided for Council review in the Act, following is a list of the names and addresses of nine of the members appointed to date:

John S. Anderson, M.D., Executive Officer, State Board of Health, Helena
Douglas S. Ashton, Rimini Route, Helena
Theodore J. Wirth, 1925 Grand Avenue, Billings
Barry D. Nolan, 3120 Green Terrace Drive, Billings
Dr. Glen R. Svore, 517 W. Crestline Drive, Missoula
J. W. Warren, 1234 W. Copper, Butte
Jack S. Brenner, Great Falls
Michael P. Doran, DVM, 4901 3rd Avenue So., Great Falls
Wesley D'Evert, Miles

If you wish a meeting, please advise us and we will endeavor to contact each of the Council members and set up a day that is most agreeable to all concerned.

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If you have any questions or suggestions concerning any of these matters, or particularly concerning the Ambient Air Quality Standards submitted, feel free to contact us at any time. If you wish to contact us by telephone, you may call us collect at the following numbers:

Dr. Anderson: 442-3260 - Ext. 241 - Area Code 406
Ben Wake: 442-3260 - Ext. 251 - Area Code 406

Sincerely yours,

Benjamin F. Wake

Benjamin F. Wake
Industrial Hygiene Engineer
Division of Disease Control

BFW:ics

Encl.

SELECTING AND SETTING OF AIR QUALITY STANDARDS

The selection of Ambient Air Quality Standards requires a substantial amount of information some of which we already have by virtue of past sampling programs in many of the cities of the state. Other information is available from recognized authoritative sources particularly on relationships between pollution levels and effects of pollution and on means of control of pollutant emissions. Other information will have to be developed for the specific elements in each of the communities by measurement, estimation, projection, or other means.

The following were the principal factors considered in selecting the Air Quality Standards:

1. The effects of pollution on health including consideration of acute and chronic aspects. The effects of combinations of various forms of contaminants and effects on segments of the population especially susceptible to injury.
2. The effects of pollution on plant and animal life, visibility, property, human senses, aesthetics and comfort and enjoyment in use of property as is outlined specifically in Section 2 of the Clean Air Act under declaration of policy and purpose.
3. Latent social and economic benefits dependent upon clean air for attainment including pride in the community and attraction of new community developments, many of which require a cleaner air quality for economic reasons.
4. Past, present and estimated future pollution levels including consideration of background levels, meteorological and topographical influences, geographic variation, and effects of land use patterns.
5. Public attitudes on air pollution with attention to past experiences.
6. Community resources and services available or obtainable to administer an air pollution control program.

In the final analysis, the selected standards will describe a level of air quality which will provide protection from the adverse effects of air pollution and also will promote the maximum comfort and enjoyment in use of property consistent with the economic and social well being of the community.

The basic use of air is to sustain life, all other uses must yield to this necessity. An essential goal in air pollution control is to provide air quality which will insure the well being of man insofar as ambient air is concerned. A further desirable goal is to provide air of optimum quality.

Air quality standards are a tool to achieve clean air and not an excuse to permit unnecessary degradation of air quality. It should be clearly understood that if a community enjoys ambient air of a quality which is superior to that defined by the proposed standards --and many communities in Montana do enjoy this quality of air--it is the objective of these standards that that community maintain this superior quality of air. It would be a gross error to pervert the intent of the air quality standards by using them as implied license to cause or to countenance any unreasonable increase in pollutant emission.

STATE OF MONTANA
STATE BOARD OF HEALTH

PROPOSED
AQUIFER AIR QUALITY STANDARDS

Reviewed for public hearing by
The Air Pollution Control Advisory Council
1967

Approved for public hearing by
The Montana State Board of Health on
1967

Adopted 1967
Montana State Board of Health
Helena, Montana

(These Standards will become effective _____ days from the date of filing with
the Secretary of State of Montana).

MONTANA AMBIENT AIR QUALITY STANDARDS

I. Introduction

In accordance with Section 6, Sub-section 12 of the Clean Air Act of Montana (House Bill 8, 1967), the Act of _____ 1967 on the Montana State Board of Health adopted the Ambient Air Quality Standards shown below.

II. Criteria

Until additional pertinent information becomes available with respect to the effects of the substances listed below which lead to recommendations by the Advisory Council and to the revision of or addition to the standards by the Board, the following air quality criteria shall apply in Montana.

AMBIENT AIR QUALITY STANDARDS

Pollutants	Standards (Maximum permissible concentrations)
Sulfur dioxide ^a	0.02 ppm, maximum annual average 0.10 ppm, 24-hour average, not to be exceeded over 1 percent of the days in any 1-month period
Reactive sulfur (sulfation) ^b	0.25 milligram sulfur trioxide per 100 square centimeters per day, maximum annual average 0.30 milligram sulfur trioxide per 100 square centimeters per day, maximum for any 1-month period
Suspended sulfate ^c	4 micrograms per cubic meter of air, maximum allowable annual average 12 micrograms per cubic meter of air, not to be exceeded over 1 percent of the time
Sulfuric acid mist ^d	4 micrograms per cubic meter of air, maximum allowable annual average 12 micrograms per cubic meter of air, not to be exceeded over 1 percent of the time 30 micrograms per cubic meter of air, hourly average, not to be exceeded over 1 percent of the time
Hydrogen sulfide ^e	0.03 ppm, 4-hour average, not to be exceeded more than twice in any 5 consecutive days 0.05 ppm, 4-hour average, not to be exceeded over twice a year
Oxidants ^f	0.02 ppm, average for 8 hours
Carbon monoxide ^g	5 ppm, average for 8 hours
Total suspended particulate ^h	75 micrograms per cubic meter of air, annual geometric mean 200 micrograms per cubic meter of air, not to be exceeded more than 1 percent of days a year

Pollutants	Standards (Maximum permissible concentrations)
Suspended particulate (Soiling index) ¹	0.4 Coh per 1,000 lineal feet, annual geometric mean
Settled particulate (Dustfall) ²	10 tons per square mile per month, 3-month average in residential areas 20 tons per square mile per month, 3-month average in heavy industrial areas
Lead ³	1.0 micrograms per cubic meter of air, 24-hour average
Nitrogen oxides ⁴	0.1 ppm, average for one hour
Beryllium ⁵	0.01 micrograms per cubic meter of air, 24-hour average
Fluorides, total (as F) in air ⁶	1 part per billion parts of air
Fluorides (as F) in forage ⁷ for animal consumption - dry weight basis	35 parts per million
Fluorides (gaseous) ⁸	0.3 micrograms per square centimeter per 28 days

- a Sulfur dioxide measured by West-Gaeke or conductometric method.
- b Sulfation measured by lead-peroxide candle.
- c Suspended sulfate measured by high volume sampler - turbidimetric procedure.
- d Sulfuric acid mist - Air Pollution Control Dist., County of Los Angeles - APCD - Sulfuric acid 13-49.
- e Hydrogen sulfide measured by methylene blue method - Lead acetate tape for screening and monitoring.
- f Oxidants measured by alkaline potassium iodide - colorimetric method.
- g Carbon monoxide measured by modified infrared method.
- h Suspended particulate measured by high-volume sampler.
- i Soiling index measured by spot tape sampler and expressed in Coh units, which relate to optical density.
- j Dustfall measured by container open to atmosphere.
- k Suspended lead measured by high-volume sampler - dithizone and/or spectrophotometric procedures.
- l Nitrogen oxides - Saltzman Method.
- m Suspended beryllium measured by high volume sampler - fluorometric and/or spectrophotometric method.
- n Total fluoride measured by Lappingers - Winter-Willard distillation procedure (SPAENS color).
- o Forage cut, dried, ashed and subjected to Winter-Willard distillation procedure (SPAENS color).
- p Gaseous fluorides measured by calcium formate paper technique in Montana State Board of Health standard shelter - Winter-Willard distillation procedure (SPAENS color).

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Ambient air quality standards listed describe a level of air quality designed to protect people from the adverse effects of air pollution; and they are intended further to promote maximum comfort and enjoyment in use of property consistent with economic and social wellbeing of the community.

The ambient air quality standards are used as a tool in achieving cleaner air, not as a license to permit unnecessary degradation of air quality which would thwart attainment of the long-range goal to maintain a reasonable degree of air purity.

These standards are not intended to represent the ultimate in air quality achievement. It is anticipated that research and development will gradually make possible cleaner air at lower cost. As evidence accumulates on deleterious effect of the contaminant, present objectives will be revised or additional standards established. The standards are designed to protect the health, welfare and comfort of the public and to minimize economic losses.

Because some pollutants combine chemically to form more harmful materials than the original emissions, ascribing a single effect to a single pollutant would be an erroneous over-simplification. The standards, therefore, apply to air containing a variety of pollutants. Although reaching the goals will result in benefits, no allowance for the time needed to achieve them was considered in their selection. They are intended to apply to areas where people live or where an adverse effect may occur.

The standards enumerated are intended for use over the state as a whole. More stringent standards may need to be established in specific areas of the state where better quality air than that described by the standards already exists.

XIII. Sampling and Analytical Procedures

The sampling and analytical procedures employed to measure ambient levels of contaminants are to be consistent with obtaining accurate results which are representative of the conditions being evaluated. The sampling and analytical techniques enumerated may be used directly or employed as reference standards against which other methods may be calibrated.

REFERENCES FOR METHODS OF ANALYSIS

- a. Sulfur dioxide - West, P.V., and G.C. Cocks. Fixation of sulfur dioxide as disulfitonercurate (II), subsequent colorimetric estimation. Anal. Chem. 28:1961. 1956.
- b. Lead Peroxide Candle (Sulfation Method) - Evaluation of total sulfation in the atmosphere by lead peroxide candle method. ASTM standards on methods of atmospheric sampling and analysis, 1962, pp. 125-128.
- c. Determination of water soluble sulfates collected on Glass Fiber Filter Web. Chemical Research and Development Sec., Air Pollution Program, USEPA.
- d. Sulfuric Acid Mist - Air Pollution Control District, County of Los Angeles, California - Laboratory Methods - Sulfuric Acid - APCD 13-49.
- e. Hydrogen Sulfide: Ultramicrodetermination of sulfides in air, Analytical Chemistry, 1957, 29 (1349-1351) (Sept). Screening and continuous monitoring method. Hydrogen sulfide - McBride, R.S. and J. D. Edwards. Lead acetate test for hydrogen sulfide in gas. N.B.S. Technical Paper No. 41. 1914.
- f. Determination of Oxidants (including ozone). Alkaline potassium iodide method. Selected methods for the measurement of air pollutants. USEPA Publication #99-AP-11.
- g. Carbon Monoxide: continuous determination of carbon monoxide and hydrocarbons in air by a modified infrared analyzer. Journal Air Pol. Cont. Assoc. 1957, 9, 110-114.
- h. Suspended particulate - Procedures for the analysis of suspended particulate matter collected on glass fiber filters. Department of Health, Education, and Welfare. Public Health Service. Division of Air Pollution. Robert A. Taft Sanitary Engineering Center. Cincinnati, Ohio. 1963
- i. Soiling Index - Pack, J. C., D. M. Kragy, and W. K. Stalker. Developments in the use of the AISI automatic smoke sampler. JAPCA. 10:303-306. August 1960. Keaton, W.C.L., O.F. Raines, Jr., and E.H. Ide. Determination of haze and smoke concentrations by filter paper samplers. Air Repair. Aug. 1953.
- j. Dustfall - Recommended standard method for continuing dustfall survey (APCA 1-a) Committee on Air Pollution Measurements of APCA. JAPCA. 5:176-181. Nov. 1955. Fader, J.S. Dustfall retention efficiencies of dustfall collectors. JAPCA. 8:35-38. May 1958. Collection and analysis of dustfall, APMA standards on methods of atmospheric sampling and analysis. pp. 97-100. 1962.
- k. Determination of LEAD in Air and in Biological Materials, the USPHS Double Extraction, mixed color dithionite method; American Conf. of Governmental Industrial Hygienists Recommended Method.
- l. Nitrogen oxides; Determination of Nitrogen Dioxide and Nitric Acid. Saltzman method; selected methods for measurement of air pollutants; EPA Publication #77-AP-11.
- m. Beryllium; Fluorometric Determination of Submicrogram quantities of beryllium; Analytical Chemistry, 1958, (April) or by Atomic Absorption Spectrophotometry.

- a. Total Fluorides: Collection procedure - Chemical Methods in Industrial Hygiene, Goldmann & Jacobs; Interscience Manual 3, Interscience Publishers, N.Y. Analytical Procedure: Standard Methods for the Examination of Water and Waste Water; American Public Health Association, Inc.; 1790 Broadway, New York, N.Y.
- b. Fluorides in Forage: Collection Procedure - Montana State Board of Health technique for forage sampling for fluoride determination; Montana State Board of Health, Air Pollution Division, Helena. Analytical Procedure: Standard Methods for the Examination of Water and Waste Water; American Public Health Association, Inc.; 1790 Broadway, New York, N.Y.
- c. Fluorides (gaseous): Collection Procedure - Montana State Board of Health Technique for Measuring Gaseous Fluorides in Air; Calcium Formate Paper Technique; Montana State Board of Health, Division of Air Pollution, Helena, Montana. Analytical Method: Standard Methods for the Examination of Water and Waste Water; American Public Health Association, Inc.; 1790 Broadway, New York, N.Y.

DOCUMENTATION OF JUSTIFICATION FOR PROPOSED
AMBIENT AIR QUALITY STANDARDS

Sulfur dioxide:

1. Commonwealth of Pennsylvania, Department of Health, Division of Air Pollution Control (Approved for hearing by the Air Pollution Commission).
2. Air Quality Goals for Interstate Air Pollution Study Area, Air Resource Management Program for Metropolitan St. Louis, Executive Committee of the Interstate Air Pollution Study. Project report - Phase II - Part VI.
3. Federal Air Quality Criteria (proposed)
4. Benefits from achieving goals: Elimination of sulfur dioxide taste and odor from air. Reduced incidence of colds, coughing, throat irritation, bronchoconstriction and other respiratory diseases and symptoms. Decreased physical stress on healthy persons. Reduced deaths from cardiovascular and pulmonary causes. Elimination of damage except for only most sensitive plants. Improved visibility. Reduced metal corrosion and fabric deterioration.
5. New York State Air Pollution Codes.
6. Colorado State Air Pollution Codes.
7. Air Quality Standards for Metropolitan St. Louis Area, Adopted February 22, 1967, Missouri Air Conservation Commission.
8. Montana State Board of Health data and experience.

Reactive Sulfur (Sulfation):

1. Air Quality Goals for Interstate Air Pollution Study Area, etc. (under sulfur dioxide)
2. Benefits: Under Sulfur dioxide.
3. Hearing before the Subcommittee on Public Health and Welfare of the Committee on Interstate and Foreign Commerce - House of Representatives, 89th Congress - September 27, 1966.
4. Air Quality Standards for Metropolitan St. Louis Area, Adopted February 22, 1967, Missouri Air Conservation Commission.
5. Montana State Board of Health data and experience.

Suspended Sulfates:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
3. See Benefits under sulfur dioxide.
4. Hearing before the Subcommittee, etc. (as under Reactive sulfur (sulfation)).
5. Same as item 7 under sulfur dioxide.
6. Montana State Board of Health data and experience.

Sulfuric Acid Mists:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. See Benefits under sulfur dioxide.
3. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
4. Hearing before the Subcommittee, etc. (as under reactive sulfur (sulfation)).
5. Air Quality Standards for Metropolitan St. Louis Area, Adopted February 22, 1967, Missouri Air Conservation Commission.
6. Montana State Board of Health data and experience.

Hydrogen Sulfide:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
3. Benefits: Elimination of odor except to most sensitive persons.
Elimination of blackening of lead base and mercury additive paints.
Elimination of vegetation damage.
Elimination of respiratory and eye irritations.
4. New York State Air Pollution Codes. (Level of sensory "irritation").
5. Same as Item 7 under sulfur dioxide.

Oxidants:

1. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
2. Benefits: Reduced vegetation damage.
Improved visual acuity.
Reduced eye, nose and throat irritation.
Improved visibility.
3. New York State Air Pollution Codes.
4. Colorado State Air Pollution Codes.
5. Hearing before the Subcommittee, etc. (as under reactive sulfur (sulfation)).
6. Same as Item 7 under sulfur dioxide.
7. Air Pollution from motor vehicles. R.I. Larsen, Ph.D., USFWS, Asst. Chief, Field Studies I.

Carbon Monoxide:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
3. Benefits: Improved body oxygen supply function.
Improved reflex time and clarity of thought and sight.
Decreased incidence of headaches associated with inhalation of carbon monoxide.

Carbon Monoxide (cont) 4. New York State Air Pollution Codes.

3. Same as Item 7 under Oxidants.
6. Hearing before the Subcommittee, etc. (as under reactive sulfur (sulfation)).

Total Suspended Particulate (High Volume Method):

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
3. Benefits: Reduced vegetation damage.
Improved visibility
Reduced metal corrosion and fabric deterioration.
Reduced cleaning costs from surface soiling.
Reduced small particle deposition in lungs
Reduced inhalation of irritant gases adhering to particles inhaled.
4. New York State Air Pollution Codes.
5. Colorado State Air Pollution Codes.
6. Same as Item 7 under sulfur dioxide.
7. Montana data and experience.

Suspended Particulate (Soiling Index):

1. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
2. Benefits: Same as for total suspended particulate.
3. Colorado State Air Pollution Codes.
4. Same as Item 7 under sulfur dioxide.
5. Montana State Board of Health data and experience.

Settled Particulate (Dustfall):

1. Commonwealth of Pennsylvania (as under sulfur dioxide).
2. Air Quality Goals for Interstate Air Pollution Study Area, etc. (as under sulfur dioxide).
Benefits:
Same as for total suspended particulate.
4. New York State Air Pollution Codes.
5. Goals for City of Chicago.
6. Missouri Air Conservation Commission (1967) - adoption.
7. Montana State Board of Health data and experience.

Fluorides (as F) in Forage:

1. New York State Air Pollution Codes.
2. Florida Laws
3. Benefits: Prevent fluorosis in livestock.
Prevent fluorosis in susceptible wild animals.
Reduce property damage. Prevent deterioration of land values.
Reduce vegetation damage.
4. Air Pollution Handbook - McGill, Ackley & Eolden (McGraw-Hill Book Co.)
5. Montana State Board of Health data and experience.
6. California Administrative Code.

Fluorides (total as F) in air:

1. New York State Air Pollution Codes.
2. Benefits: Same as under fluorides (as F) in forage.
Prevents buildup of fluoride in forage to toxic level.

Lead:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide).
2. Same as Item 7 under oxidants - (Larsen)

Beryllium:

1. Commonwealth of Pennsylvania, etc. (as under sulfur dioxide)
2. New York State Air Pollution Codes.
3. Recommended by the Atomic Energy Commission.

Fluorides (gaseous only)

Calcium Formate Paper Method:

1. Montana State Board of Health data and experience.
2. Florida Air Pollution Control Commission experience using the calcium formate paper technique.

RELATIONSHIPS BETWEEN AIR QUALITY AND CONTROL STANDARDS

EFFECT	CAUSES	POSSIBLE BASIS FOR AIR QUALITY STANDARDS	POSSIBLE BASIS FOR SOURCE CONTROL
1. Soiling	Particulate matter of wide range of size and other characteristics	a. Soiling of filter paper b. Dust fall rate c. Wt. concentration of suspended dust d. Particle count	a. Wt. concn. of dust in stack b. Wt. rate of dust emission c. Density or capacity of emitted plume d. Improved combustion
2. Visibility Reduction	Smoke, fume, other small particles and condensation nuclei, products of atmospheric reactions	a. Visibility measurement by eye b. Light attenuation or scattering measurement c. Number count and sizing of small particles	a. Same as 1 (a through d) b. Limit on emission of reactive pollutants
3. Irritation (eyes, nose, throat, etc.)	Aldehydes, acrolein, PAN, and other products of atmospheric reactions; SO ₂ , SO ₃ , and other irritating gases and vapors	a. Wet chemical methods b. Physical methods - IR, GLC, etc. c. Filtration for H ₂ SO ₄ aerosol	a. Same as 2b b. Concentration of irritant in stack gases c. Weight rate of irritant emission d. Ground level concentration - time relationship for point source
4. Odors	H ₂ S, mercaptans, S- and N-containing organic materials, also, gases and vapors	a. Chemical or physical methods for specific gases b. Odor panels c. Devices for dilution to odor threshold	a. Control of specific materials based on stack concentration or weight rate of emission b. Control based on odor strength c. Same as 2d
5. Vegetation Damage	SO ₂ , HF, ethylene, products of atmospheric reactions (PAN)	a. Chemical and physical methods for specific toxicants b. Measure of photosynthesis rate or actual degree of damage c. Amount of toxicant in plant material	a. Same as 4a b. Same as 2b c. Same as 2d d. Amount of toxicant in plant material
6. Deterioration of materials	CO ₂ , SO ₂ , SO ₃ , H ₂ S, and other acidic gases plus solid and liquid particulates, also	a. Corrosion rate of metals b. Change in characteristics of materials c. Chemical and physical methods for specific pollutants	a. Same as 4a b. Same as 2b c. Same as 2d

THE CONTROL PROGRAM BASED ON AIR QUALITY STANDARDS

Following the selection of air quality standards, abatement plans will have to be drawn up to determine the degree to which each individual source or group of sources must be controlled in order to achieve the selected standards. It is reasonable to expect that some polluters will have to control emissions to a greater extent than others. The degree of control required of each source or class of sources will depend on its relative contribution to the total pollution load and the feasibility of control. Abatement plans will take into consideration the potential future growth of the area and its potential additional atmospheric pollution load.

An emergency plan should be established to insure that acute episodes of sufficient magnitude to be an immediate problem in a community are not created. At this time, I know of no places in Montana except Garrison, where acute episodes are likely to occur.

A schedule for abatement of emissions from sources will have to be made. It is unreasonable to expect that abatement will occur overnight. It is reasonable, however, to expect that controls will be established in accordance with a time schedule. A series of discussions with each individual polluter or groups of polluters will be necessary before a reasonable time schedule can be formulated. Enforcement must include control of established and new sources of air pollution within the framework of the whole plan.

The air monitoring program must be enlarged and maintained to insure that progress is being made toward reaching established air quality standards where they are exceeded and not deteriorating where better quality air exists. Monitoring should be continued in "roll back" after initial goals are achieved.

Provision will be made for study and research for the purpose of obtaining information on how to do a better job and particularly relating to arsenals, lead, beryllium, sulfur dioxide and smoke. Available community resources such as industry, universities and technical groups may be utilized for this activity.

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