



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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FEB 06 2013

Ref: 8P-AR

The Honorable Steve Bullock
Governor of Montana
Montana State Capitol Building
P.O. Box 200801
Helena, Montana 59620-0801

Dear Governor Bullock:

Thank you for your staff's May 27, 2011, recommendations on air quality designations for the state of Montana for the 2010 revision to the primary National Ambient Air Quality Standard for sulfur dioxide (SO₂). Reducing levels of sulfur dioxide pollution is an important part of the U. S. Environmental Protection Agency's (EPA) commitment to a clean, healthy environment. Exposure to SO₂ can cause a range of adverse health effects, including narrowing of the airways which can cause difficulty breathing and increased asthma symptoms. This letter is to notify you of the EPA's preliminary intentions regarding your recommended designations.

On June 3, 2010, the EPA strengthened the health-based or "primary" standard for SO₂ by establishing a standard for 1-hour average SO₂ concentrations at a level of 75 parts per billion. The Clean Air Act requires the EPA to complete the initial designations process within two years of promulgating a new or revised standard. If the Administrator has insufficient information to make these designations, the EPA has the authority to extend the designation process by up to one year. On July 27, 2012, the EPA announced that it had insufficient information to complete the designations for the 1-hour SO₂ standard within two years and extended the designations deadline to June 3, 2013.

At this time the EPA is proceeding with designating as nonattainment most areas in locations where existing monitoring data from 2009-2011 indicate violations of the 1-hour SO₂ standard. The EPA intends to address the designations for all other areas in separate future actions. With input from a diverse group of stakeholders, EPA has developed a comprehensive implementation strategy for these future actions that focuses resources on identifying and addressing unhealthy levels of SO₂. The strategy is available at: <http://www.epa.gov/airquality/sulfurdioxide/implement.html>. The EPA will continue to work closely with you and our other partners at the state, tribal and local levels to ensure health-protective, commonsense implementation of the 1-hour SO₂ standard.

Consistent with the Clean Air Act, after carefully considering Montana's recommendations and all of the associated technical information for the 2010 SO₂ standard, including the most recent air quality data

from 2009-2011, the EPA intends to designate as nonattainment the following area, including the following counties or portions of counties:

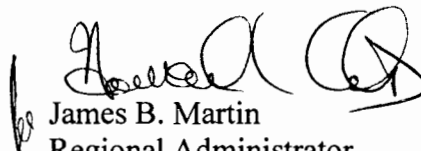
<u>Nonattainment Area</u>	<u>County</u>
Area 1	Yellowstone County (excluding Crow Tribe of Montana)

The enclosed draft Technical Support Document provides a detailed analysis that supports our preliminary nonattainment area decisions. In assessing the air quality for Yellowstone County, you requested that the EPA exclude 2010 air quality monitoring data and consider a three-year average using 2009, 2011, and 2012 data sets, or 2011-2013 data sets for designations. Based on the available data, we are not at this time able to concur with the state of Montana's position that the 2010 data are not representative of normal yearly emissions. Because compliance with the SO₂ 1-hour standard is determined based on 3 consecutive years of complete data, the EPA does not believe it would be appropriate to exclude considering 2010 data. In addition, because the deadline for promulgating the SO₂ designations is June, 2013, a complete year of data for 2013 will not be available for use in designations. Therefore, we are proceeding with designations using the data set of 2009-2011.

The EPA will continue to work with state officials regarding the appropriate boundary for the nonattainment area in Montana. If you have additional information that you would like the EPA to consider, please submit it to us by April 8, 2013. We also will be publishing a notice in the Federal Register announcing a 30-day period for the public to provide input on EPA's preliminary designation decisions. We intend to promulgate these designations for areas with monitored violations of the 2010 SO₂ standard by June, 2013.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2010 primary SO₂ standard. For additional information regarding initial designations on the SO₂ standard, please visit our website at www.epa.gov/so2designations. Should you have any questions, please do not hesitate to call me, or have your staff contact Crystal Ostigaard of my staff at (303) 312-6602 or ostigaard.crystal@epa.gov.

Sincerely,


James B. Martin
Regional Administrator

Enclosure

cc: Tracy Stone-Manning, Director, DEQ
Dave Klemp, Chief, ARMB

Gina McCarthy, Assistant Administrator for Air and Radiation
Stephen D. Page, Director, Office of Air Quality Planning and Standards