



July 1, 2016

Monica Morales
Acting Air Program Director
United States Environmental Protection Agency
Region VIII
1595 Wynkoop St.
Denver, CO 80202-1129

RE: Sources within Montana Subject to 40 CFR 51 Subpart BB – Characterization Methodology and Modeling Protocol

Dear Ms. Morales:

As you are aware, the U.S. Environmental Protection Agency (EPA) promulgated a revision to the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO₂) on June 2, 2010 (75 FR 35520). Pursuant to 42 USC §7407(d)(1), the U.S. Congress directs the EPA to designate all areas of the Country as nonattainment, attainment, or unclassifiable with respect to a new or revised NAAQS. On August 21, 2015, the EPA finalized and published the Data Requirements Rule (DRR) for Characterizing Air Quality for the Primary SO₂ NAAQS at 40 CFR 51.1200 (Subpart BB). Specifically at 40 CFR 51.1200(2) an applicable source is defined as a stationary source that has actual annual SO₂ emission data of 2,000 tons or more or, has been identified by an air agency or by the EPA Regional Administrator as requiring further air quality characterization.

In Montana's source identification letter submitted to the Agency on January 15, 2016, Montana identified the Talen Energy Colstrip Generating Units 1-4 as the only source in Montana subject to the DRR. The EPA responded to Montana concurring that the Colstrip facility in Rosebud County is the only source subject to the DRR.

Montana has determined that modeling the Colstrip facility will be the most efficient methodology to characterize air quality for the primary SO₂ NAAQS as required in 40 CFR 51.1200. Please find, included with this letter, Montana's modeling protocol for your review. Montana will notify the EPA promptly if any changes are necessary to the protocol.

Having selected the appropriate methodology for determining Rosebud County's SO₂ NAAQS designation, Montana will provide the EPA the final designation modeling and recommended designation for Rosebud County on or before January 13, 2017 as required in the DRR.

If you have any questions regarding this action, please contact Stephen Coe, the Department of Environmental Quality, Air Quality Bureau Senior Planning Engineer, by telephone at (406) 782-2689 x 209 or by email at scoc@mt.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Klomp", is written over the word "Sincerely,".

David L. Klomp
Bureau Chief
Air Quality Bureau

Enclosure

cc: Adam Clark, Air Quality Planner, US EPA Region 8
Tom Livers, Director, Montana Department of Environmental Quality
Annette Williams Technical Support Services Program Manager, Air Quality Bureau MT DEQ
Liz Ulrich Analysis & Planning Services Section Supervisor, Air Quality Bureau MT DEQ
Stephen Coe, Senior Planning Engineer, Air Quality Bureau, MT DEQ