



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

Ref: 8P-AR

Honorable John W. Hickenlooper
Office of the Governor
136 State Capitol Bldg
Denver, Colorado 80203-1792

AUG 22 2017

Dear Governor Hickenlooper:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for certain areas in Colorado for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designation-related recommendations and information your state submitted in letters dated March 18, 2011, September 18, 2015 and March 16, 2017.¹

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016 and November 29, 2016. In Colorado, the following areas were designated in these previous actions: Colorado Springs and Fort Morgan. Pursuant to a March 2, 2015, court-ordered schedule,² the agency must complete the remaining SO₂ designations by two specific deadlines: December 31, 2017 and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for all remaining undesignated areas in Colorado. We are in agreement with your recommendations for these areas, and we provide more information on our analysis in the accompanying technical support document.

If you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to EPA Region 8. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

Colorado has recommended a designation of attainment/unclassifiable for the areas indicated below. EPA regulations for implementing the SO₂ NAAQS require Colorado to characterize SO₂ air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Colorado or by a third party. Our review of this information indicates that it is consistent with your recommendation.

¹ Colorado also provided information relevant to these designations on January 13, 2017.

² *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

Unclassifiable/Attainment Area	Included Counties
North Denver Area (10 km radius around the Cherokee Generating Station)	Adams (p), Denver (p), Jefferson (p)
Craig, Colorado Area (10 km radius around the Craig Generating Station)	Moffat (p)
Hayden, Colorado Area (10 km radius around the Hayden Generating Station)	Routt (p)
Pueblo, Colorado Area (10 km radius around the Comanche Station with the additional incorporation of land within Pueblo city limits, St. Charles Mesa Census County Division (CCD), and census tract 29.03)	Pueblo (p)

Enclosure 1 to this letter provides the information that supports the intended designation decisions for these areas in Colorado.³

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Colorado that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in Enclosure 2.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. We are then required to designate all other remaining undesignated areas in Colorado by December 31, 2020, consistent with the prescribed timing of the court order.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement

³ Enclosure 1 is Chapter 7 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in Colorado. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.

the 2010 primary SO₂ NAAQS. For additional information regarding designations under the SO₂ NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to contact me, or your Air Quality Program. Your staff may contact Monica Morales, Region 8's Air Program Director, at morales.monica@epa.gov or (303) 312-6936.

Sincerely,



Debra H. Thomas
Acting Regional Administrator

Enclosures

cc: Dr. Larry Wolk, Executive Director and Chief Medical Officer
Colorado Department of Public Health and Environment

Martha E. Rudolph, Director
Environmental Programs
Colorado Department of Public Health and Environment

Garry Kaufman, Director
Colorado Air Pollution Control Division

Enclosure 2

List of all remaining areas of Colorado that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. The EPA intends to designate each of these areas as a separate unclassifiable/attainment area.

County or Partial County (p)	Included Area, If Partial County
State Air Quality Control Region (AQCR) 01: Logan, Morgan (p), Phillips, Sedgwick, Washington and Yuma Counties	Morgan County apart from the previously designated 12 km circle around Pawnee.
AQCR 02 Larimer and Weld Counties	
AQCR 03 Adams (p), Arapahoe, Boulder, Broomfield, Clear Creek, Denver (p), Douglas, Jefferson (p), and Gilpin Counties	Adams and Denver County apart from the 10 km radius around the Cherokee Power Plant.
AQCR 04 El Paso, Park, and Teller Counties	
AQCR 05 Cheyenne, Elbert, Kit Carson, and Lincoln Counties	
AQCR 06 Baca, Bent, Crowley, Kiowa, Otero, and Prowers Counties	
AQCR 07 Huerfano and Las Animas Counties, Pueblo County (p)	Pueblo County apart from a 10 km radius around the Comanche Station with the additional incorporation of land within Pueblo city limits, St. Charles Mesa CCD, and census tract 29.03.

AQCR 08 Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties	
AQCR 09 Archuleta ¹ , La Plata ¹ , and Montezuma ¹ Counties, Dolores County, San Juan County	
AQCR 10 Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel Counties	
AQCR 11 Garfield, Mesa, Moffat (p), and Rio Blanco Counties	Moffat County apart from a 10 km radius around the Craig Generating Station.
AQCR 12 Eagle, Grand, Jackson, Pitkin, Routt, and Summit Counties	Routt County apart from a 10 km radius around the Hayden Generating Station.
AQCR 13 Chaffee, Custer, Fremont, and Lake Counties	

¹ Includes areas of Indian country located in the county.
(p) indicates portion of county.