



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8P-AR

AUG 22 2017

Honorable Steve Bullock
Office of the Governor
P.O. Box 200801
Helena, Montana 59620-0801

Dear Governor Bullock:

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 Montana 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 27, 2011 and December 28, 2016.

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 Montana, the following area was designated in a previous action: Billings (which has since been redesignated). Pursuant to a March 2, 2015 court-ordered schedule,¹ 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 the remaining undesignated areas in Montana. 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 will also 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.

Montana has recommended a designation of attainment for the area indicated below. EPA regulations for implementing the SO₂ NAAQS require Montana 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 Montana or by a third party. Our review of this information indicates that it is consistent with your recommendation.

¹ *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

Unclassifiable/Attainment Area	Included Counties
Rosebud County	Rosebud County, and the portion of the Northern Cheyenne Reservation located in Big Horn County.

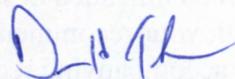
Enclosure 1 to this letter provides the information that supports the intended designation decision for this area in Montana.²

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Montana 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. Upon the completion of this designation action, there will be no remaining areas in Montana to be designated for the 2010 primary SO₂ NAAQS.

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 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: Tom Livers, Director
Montana Department of Environmental Quality

Dave Klemp, Bureau Chief

² Enclosure 1 is Chapter 23 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in Montana. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.

Enclosure 2

List of all remaining areas of Montana 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
Beaverhead	
Big Horn (p) ¹	The portion of the county that does not include the Northern Cheyenne Reservation.
Blaine ¹	
Broadwater	
Carbon	
Carter ¹	
Cascade	
Chouteau ¹	
Custer	
Daniels ¹	
Dawson	
Deer Lodge	
Fallon	
Fergus	
Flathead ¹	
Gallatin	
Garfield	
Glacier ¹	
Golden Valley	
Granite	
Hill ¹	
Jefferson	
Judith Basin	
Lake ¹	
Lewis and Clark	
Liberty	
Lincoln	
Madison	
McCone ¹	
Meagher	

Mineral	
Missoula ¹	
Musselshell	
Park	
Petroleum	
Phillips ¹	
Pondera ¹	
Powder River	
Powell	
Prairie	
Ravalli	
Richland	
Roosevelt ¹	
Sanders ¹	
Sheridan ¹	
Silver Bow	
Stillwater	
Sweet Grass	
Teton	
Toole	
Treasure ¹	
Valley ¹	
Wheatland	
Wibaux	
Yellowstone (p) ¹	The portion of the county that does not include the Billings attainment area.

¹ Includes areas of Indian country located in the county.

(p) indicates portion of county.