

STATE OF MONTANA

RECORD OF ADOPTION

State Implementation Plan Update

Pertaining to the Request for the Initial Designation of the 2010
1-Hour SO₂ Standard Pursuant to the Data Requirements Rule

Date of Governor Signature:

December 20, 2016

OFFICE OF THE GOVERNOR
STATE OF MONTANA

STEVE BULLOCK
GOVERNOR



MIKE COONEY
LT. GOVERNOR

December 20, 2016

Shaun McGrath
Region 8 Administrator
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 – Modeling Results and Resulting Area Designation.

Dear Mr. McGrath:

I am writing to request the U.S. Environmental Protection Agency (EPA) designate Rosebud County as attainment for the 2010 sulfur dioxide (SO₂) National Ambient Air Quality Standards (NAAQS). As you are aware, the EPA promulgated a revision to the NAAQS for SO₂ on June 2, 2010 (75 FR 35520). Pursuant to 42 USC §7407(d)(1), the U.S. Congress directs the EPA to designate areas identified by the governor of each state as nonattainment, attainment, or unclassifiable with respect to a new or revised NAAQS. In a May 27, 2011, letter to James Martin (Administrator, EPA Region 8) from Richard Opper (Director, Montana DEQ), pursuant to 42 USC § 7407, Montana requested designation of all 56 counties in the state as attainment or unclassifiable for the 2010 SO₂ NAAQS. In response, the EPA designated a portion of Yellowstone County as nonattainment for the 2010 SO₂ NAAQS, with the intent to act on the remaining designations at a later date.

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 that has been identified by an air agency or the EPA Regional Administrator as requiring further air quality characterization. In Montana's source identification letter submitted to the EPA on January 15, 2016, Montana identified the Talen Energy Colstrip Generating Units 1-4 as the only source in Montana subject to the DRR, and the EPA concurred.

As required in 40 CFR 51.1200 Subpart BB, Montana requests the appropriate designation of attainment for the 2010 SO₂ NAAQS for Rosebud County. In a July 1, 2016, letter to Monica

Morales (Acting Air Program Director, EPA Region 8), Montana determined that modeling the Colstrip facility was the most efficient methodology to characterize air quality for the primary SO₂ NAAQS, as required in 40 CFR 51.1200. EPA agreed in an email to Kristen Martin on August 31, 2016. Please find included with this letter Montana's modeling results technical document for your review.

At this time, Montana reiterates its request that the EPA designate all remaining areas within the state as attainment or unclassifiable for the 2010 SO₂ NAAQS.

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 scoe@mt.gov.

Sincerely,



STEVE BULLOCK
Governor

Enclosure