



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF THE REGIONAL
ADMINISTRATOR

AUG 22 2017

The Honorable Kate Brown
Office of the Governor
State Capitol Building
900 Court Street NE, 160
Salem, Oregon 97301

Dear Governor Brown:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for certain areas in Oregon for the 2010 Primary National Ambient Air Quality Standard 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 designations-related recommendations and information your state submitted in letters dated January 10, 2016, July 6, 2016, and January 23, 2017.

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 Oregon, there were no areas designated in these previous actions. 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 remaining undesignated areas in Oregon. We are in general agreement with your recommendation.

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 the EPA, Region 10. 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.

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

| Unclassifiable/Attainment Area | Included County |
|--------------------------------|-----------------|
| Morrow County Area | Morrow County |

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

Enclosure 1 to this letter provides the information that supports the intended designation decisions for these areas in Oregon.²

Finally, we intend to designate as unclassifiable/attainment³ all remaining areas of Oregon³ 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 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 Oregon to be designated.

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 call me or have your staff contact John Chi, Office of Air and Waste, at (206) 553-1185 or chi.john@epa.gov.

Sincerely,



Michelle L. Pirzadeh
Acting Regional Administrator

Enclosures

cc: Mr. Richard Whitman
Director, Oregon Department of Environmental Quality

Mr. David Collier
Program Manager, Oregon Department of Environmental Quality, Air Planning

² Enclosure 1 is Chapter 34 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in Oregon. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.

³ Our intended designated areas include all areas of Indian country located in each of the indicated areas.