

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Ref: 8P-AR

MAR 2 4 2004

Honorable Judy H. Martz Governor of Montana State Capitol Helena, MT 59601

Dear Governor Martz:

Thank you for your recent letter of February 5, 2004 forwarding Montana's Air Quality Division's recommendations on air quality designations for the national health based standards for fine particles.

Your letter is an important step toward providing citizens in your state with critical information about air pollution levels in their community. We intend to carefully review the recommendations and work with Trista Glazier with Montana's Department of Environmental Quality, as necessary in determining final designations.

As explained in the attached guidance, our April 2003 PM2.5 designations guidance established the metropolitan area (i.e., the larger of the Consolidated Metropolitan Statistical Area (CMSA) or Metropolitan Statistical Area (MSA)) as the presumptive boundary for PM2.5 nonattainment areas, based on the Office of Management and Budget (OMB) 1999 definition of CMSA and MSA. We acknowledged in our April 2003 guidance that OMB planned to publish revised urban area definitions sometime in 2003, but because the specific release date was not known at that time, the guidance stated that the Environmental Protection Agency (EPA) anticipated using the 1999 definitions for the PM2.5 designations process. OMB subsequently issued revised urban area definitions on June 6, 2003. While we are not requiring states to use the recently-issued OMB urban area definitions, EPA does intend to assess all counties included in OMB's 2003 definitions, as well as any adjacent counties, when reviewing each state's recommendations. All counties will be reviewed using the 9 factors identified in the April 1, 2003 guidance.

We look forward to working with Montana in the coming months on designations for the fine particle standards. If you have any questions, please do not hesitate to call me or Richard Long, Director, Air and Radiation Program, of my staff at 303-312-6005.

Sincerely,

Robert E. Roberts

Regional Administrator

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cc: Jan Sensibaugh, Director, MT DEQ w/enclosure

Don Vidrine, Bureau Chief, MT DAQ w/enclosure

Trista Glazier, MT DAQ w/enclosure