



Montana Department of
ENVIRONMENTAL QUALITY

Judy Martz, Governor

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November 10, 2004

Richard Long
EPA Region 8
999 18th Street – Suite 300
Denver, CO 80202-2466

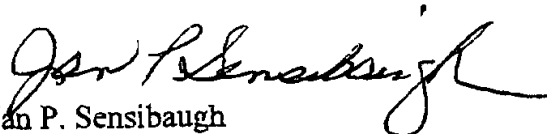
Re: Montana PM-2.5 Section 107(d) Attainment Area Designations

Dear Mr. Long:

Following a recent meeting between Montana and EPA, and in the interest of reaching a conclusion that satisfies your charge to establish PM-2.5 attainment areas pursuant to guidance, Montana concedes to EPA designating Section 107(d) PM-2.5 attainment areas using county boundaries. We do appreciate EPA's willingness to work with us while we collectively seek the best solutions. It is also our understanding that boundaries could be amended in the future using an agreed upon system as discussed earlier and as alluded to in your letter dated July 20, 2004.

As we have previously indicated, use of entire counties as a basis for creating PSD baseline areas for increment tracking purposes continues to be problematic for reasons stated in various correspondences. As such, Montana hereby reiterates the necessity of reaching an understanding with EPA concerning the establishment of baseline areas and the function of increment tracking. We are firmly committed to finding a workable solution to this issue, and look forward to meeting with EPA to demonstrate the 10 km grid system and its practical application for planning purposes. Thank you again for seeking a middle ground.

Sincerely,


Jan P. Sensibaugh
Director

c: Steve Welch, Administrator, Permitting and Compliance Division
Don Vidrine, Chief, Air Resources Management Bureau
Bob Habeck, Air Resources Management Bureau
Steve Tuber, EPA