



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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FEB 16 2016

Ref: 8P-AR

The Honorable John Hickenlooper  
Office of the Governor  
136 State Capitol Building  
Denver, Colorado 80203

Dear Governor Hickenlooper:

Thank you for your staff's recommendations dated September 18, 2015, on air quality designations for the state of Colorado for the 2010 revision to the primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). Reducing levels of SO<sub>2</sub> pollution is an important part of the U.S. Environmental Protection Agency's (EPA's) commitment to a clean, healthy environment. Exposure to SO<sub>2</sub> can cause a range of adverse health effects, including narrowing of the airways which can cause difficulty breathing and increased asthma symptoms. This letter is to notify you of the EPA's preliminary intentions regarding your recommended designations.

On June 3, 2010, the EPA strengthened the health-based or "primary" standard for SO<sub>2</sub> by establishing a standard for 1-hour average SO<sub>2</sub> concentrations at a level of 75 parts per billion. Within one year after a new or revised standard is established, the Clean Air Act requires the Governor of each state to submit to the EPA a list of all areas in the state, with recommendations for whether each area meets the standard. Through an interactive process, the EPA considers the recommendations and then promulgates designations for all areas across the country. On July 25, 2013, the EPA designated 29 areas in 16 states as nonattainment, but did not at that time designate other areas. Pursuant to a March 2, 2015, court-ordered schedule,<sup>1</sup> the EPA must complete the remaining SO<sub>2</sub> designations by three specific deadlines: July 2, 2016, December 31, 2017, and December 31, 2020.

This current round of designations, to be completed by July 2, 2016, addresses two groups of areas: (1) areas that have newly monitored violations of the 2010 SO<sub>2</sub> NAAQS based on the most recent three calendar years of certified monitored ambient air quality data, and (2) areas that contain any stationary source that had not been announced as of March 2, 2015, for retirement and that according to the EPA's Air Markets Database emitted in 2012 either (i) more than 16,000 tons of SO<sub>2</sub> or (ii) more than 2,600 tons of SO<sub>2</sub> with an annual average emission rate of at least 0.45 pounds of SO<sub>2</sub>/mmBTU.

Because the EPA has insufficient information to determine whether the following areas are meeting or not meeting the SO<sub>2</sub> NAAQS, the EPA intends to designate these areas as unclassifiable:

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

Intended Unclassifiable Areas

Colorado Springs\*

Morgan County\*

Intended Unclassifiable Counties

El Paso County

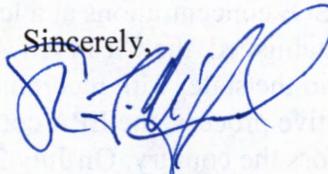
Morgan County

The asterisks (\*) indicate the boundaries for these intended unclassifiable areas represent modifications to the boundaries that you have recommended. In this case, because your staff did not recommend specific boundaries but instead recommended designations for the areas around the Pawnee and Martin Drake power plants, the EPA has proposed full-county unclassifiable boundaries for the counties in which these sources are located.

The enclosed Technical Support Document provides a detailed analysis that supports our intended designation decisions. If your state has additional information that the EPA should consider prior to finalizing these designations, please submit it to us by April 19, 2016. We also will be publishing a notice in the Federal Register announcing a 30-day period for the public to provide input on the EPA's intended designation decisions. We will promulgate the designations for these areas by July 2, 2016. We will designate all other previously undesignated areas in the state on a schedule consistent with the prescribed timing of the court order, i.e., by December 31, 2017, or December 31, 2020.

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 SO<sub>2</sub> standard. For additional information regarding designations under the SO<sub>2</sub> standard, please visit our website at [www.epa.gov/so2designations](http://www.epa.gov/so2designations). Should you have any questions, please do not hesitate to call me, or have your staff contact Carl Daly of my staff at (303) 312-6416 or [daly.carl@epa.gov](mailto:daly.carl@epa.gov).

Sincerely,



Shaun L. McGrath  
Regional Administrator

Enclosure

cc: Dr. Larry Volk  
Environmental Director and Chief Medical Officer, Colorado Department of Public Health and Environment

William Allison  
Director, Air Pollution Control Division

Janet G. McCabe, Acting Assistant Administrator for Air and Radiation  
Stephen D. Page, Director, Office of Air Quality Planning and Standards