



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

OFFICE OF THE
REGIONAL ADMINISTRATOR

AUG 22 2017

The Honorable Kim Reynolds
Governor, State of Iowa
1007 East Grand Avenue
Des Moines, Iowa 50319

Dear Governor Reynolds:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for certain areas in Iowa for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂).¹ 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 June 2, 2011, April 8, 2013, November 4, 2015, January 5, 2017, and April 3, 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 Iowa, the following areas were designated in these previous actions: Des Moines County, Wapello County, Woodbury County and a portion of Muscatine County. Pursuant to a March 2, 2015, court-ordered schedule,² 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 Iowa. While we are in agreement with your recommendation for many of these areas, some areas warrant further discussion as explained below and in the accompanying technical support document. We stand ready to assist and hope to resolve any differences regarding the proper designation for these areas within this 120-day period provided by the Clean Air Act.

To this end, 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 EPA Region 7. 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.

¹ Our intended designated areas include all areas of Indian country located in each of the indicated areas.

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



The state of Iowa has recommended a designation of unclassifiable/attainment for the areas indicated below. EPA regulations for implementing the SO₂ NAAQS require Iowa 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 Iowa or by a third party. For Louisa County, our review of this information indicates that it is consistent with your recommendation. For Linn County and Pottawattamie County, our review of this information indicates that it is not consistent with your recommendation due to either a lack of air dispersion modeling or unresolved air dispersion modeling issues, which would require a modification of the recommended designation. We invite Iowa to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation.

Unclassifiable Area	Included Counties
Linn County	Linn County*
Pottawattamie County	Pottawattamie County*

(p) indicates portion of county

Unclassifiable/Attainment Area	Included Counties
Louisa County	Louisa County

(p) indicates portion of county

An asterisk (*) indicates that the EPA's review of the available information is not consistent with your recommendation for this county, or for a portion of it.

Enclosure 1 to this letter provides the information that supports the intended designation decisions for these areas in Iowa.³

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Iowa that were not required to be characterized and for which 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. A list of these remaining areas is included in Enclosure 2.

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 completion of this designation action, there will be no remaining areas in Iowa 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

³ Enclosure 1 is Chapter 14 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, that addresses areas in Iowa. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.

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 David Peter of my staff at (913) 551-7397 or peter.david@epa.gov.

Sincerely,



Edward H. Chu

Acting Regional Administrator

Enclosures

cc: Chuck Gipp, Iowa Department of Natural Resources
Catharine Fitzsimmons, Iowa Department of Natural Resources

Enclosure 2

List of all remaining areas of Iowa 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 intends to designate each of these areas as a separate unclassifiable/attainment area.

County or Partial County (p)	Included Area, If Partial County
Adair	
Adams	
Allamakee	
Appanoose	
Audubon	
Benton	
Black Hawk	
Boone	
Bremer	
Buchanan	
Buena Vista	
Butler	
Calhoun	
Carroll	
Cass	
Cedar	
Cerro Gordo	
Cherokee	
Chickasaw	
Clarke	
Clay	
Clayton	

Clinton	
Crawford	
Dallas	
Davis	
Decatur	
Delaware	
Dickinson	
Dubuque	
Emmet	
Fayette	
Floyd	
Franklin	
Fremont	
Greene	
Grundy	
Guthrie	
Hamilton	
Hancock	
Hardin	
Harrison	
Henry	
Howard	
Humboldt	
Ida	
Iowa	
Jackson	
Jasper	
Jefferson	
Johnson	

Jones	
Keokuk	
Kossuth	
Lee	
Lucas	
Lyon	
Madison	
Mahaska	
Marion	
Marshall	
Mills	
Mitchell	
Monona	
Monroe	
Montgomery	
Muscatine (p)	Portion of Muscatine County not designated nonattainment on July 25, 2013
O'Brien	
Osceola	
Page	
Palo Alto	
Plymouth	
Pocahontas	
Polk	
Poweshiek	
Ringgold	
Sac	
Scott	

Shelby	
Sioux	
Story	
Tama	
Taylor	
Union	
Van Buren	
Warren	
Washington	
Wayne	
Webster	
Winnebago	
Winneshiek	
Worth	
Wright	

An asterisk (*) indicates that the intended designation for this county or portion of a county represents a modification to the designation that Iowa has most recently recommended.