



J. Kevin Stitt
Office of the Governor
State of Oklahoma

January 27, 2025

Mr. Scott Mason, Regional Administrator
U.S. Environmental Protection Agency, Region 6
1201 Elm St., Suite 500
Dallas, TX 75270

Subject: Designation Recommendation for 2024 Fine Particulate Matter NAAQS

Dear Administrator ~~Nance~~:

On February 7, 2024, the U.S. Environmental Protection Agency (EPA) revised the primary annual fine particulate matter (PM_{2.5}) national ambient air quality standard (NAAQS) (89 FR 16202, March 6, 2024). In that action, EPA strengthened the primary annual PM_{2.5} standard from 12.0 micrograms per cubic meter (µg/m³) to 9.0 µg/m³; retained the existing 24-hour PM_{2.5} standard at 35 µg/m³; retained the existing 24-hour PM₁₀ (coarse particle) standard at 150 µg/m³; and did not change the current suite of secondary PM standards. As required by section 107(d)(a)(A) of the federal Clean Air Act (42 USC § 7407) and on behalf of the State of Oklahoma, I recommend that each of the 77 counties in Oklahoma be designated as attainment/unclassifiable for the revised primary annual PM_{2.5} standard.

This recommendation is based on an evaluation performed by the Department of Environmental Quality (DEQ) of certified PM_{2.5} monitoring data from 2021 through 2023, as specified in EPA guidance. DEQ has also considered preliminary 2024 data because EPA expects to make final designation decisions based on the 2022-2024 monitor data. This recommendation takes into account the exceptional event demonstrations being submitted to EPA Region 6 by February 7, 2025, for events taking place in calendar years 2022 and 2023. With this data removed from consideration during the designation process, all PM_{2.5} regulatory monitors in the State of Oklahoma would be monitoring attainment for the 2024 PM_{2.5} standard. Attached is a table showing design values for DEQ's PM_{2.5} monitoring network to support this conclusion.

An additional note of consideration in this process is the fact that Oklahoma has largely used a monitoring device approved by EPA for use as a method for NAAQS-comparable PM_{2.5} data collection, but now known by EPA to have produced highly biased data. An attempt was made by the device manufacturer, and approved by EPA, to retroactively apply a correction to address this issue. Oklahoma, as well as other states operating this device, are now finding that the approved correction did not fully address the bias. Oklahoma believes that the remaining known bias in this dataset alone is enough to inaccurately skew the values above the regulatory standard, and with the still present high bias removed, all PM_{2.5} regulatory monitors in the State of Oklahoma would

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be monitoring attainment for the 2024 PM_{2.5} standard. For this additional reason, I am recommending that EPA designate all 77 of Oklahoma's counties as attainment/unclassifiable.

If you desire additional information, or you have any questions concerning this matter, please contact Kendal Stegmann at 405-702-4100.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Kevin Stitt', with a large, stylized 'S' or 'A' shape at the end.

J. Kevin Stitt
Governor

cc: Jeff Starling, Secretary of Energy and Environment
Robert Singletary, Executive Director, DEQ
Kendal Stegmann, Division Director, Air Quality Division, DEQ

Site Name	Site Number	County	2021 Mean (µg/m ³)	2022 Mean (µg/m ³)	2023 Mean (µg/m ³)	2024 Mean* (µg/m ³)	2021-2023 Design Value (µg/m ³)	2022-2024* Design Value (µg/m ³)
Healdton	40-019-0297	Carter	7.9	6.7	7.5	9.0	7.4	7.7
Moore	40-027-0049	Cleveland	9.9	8.7	9.2	9.5	9.3	9.2
Lawton	40-031-0651	Comanche	7.5	7.0	6.9	6.8	7.1	6.9
Seiling	40-043-0860	Dewey	6.9	6.8	7.1	7.6	6.9	7.2
Ponca City	40-071-0604	Kay	10.5	7.5	9.2	9.9	9.0	8.9
Oklahoma City Downtown	40-109-0035	Oklahoma	8.4	7.4	9.5	8.0	8.4	8.3
Oklahoma City Near Road	40-109-0097	Oklahoma	10.0	8.3	8.9	9.3	9.1	8.8
North Oklahoma City	40-109-1037	Oklahoma	9.5	8.3	8.1	8.7	8.6	8.4
McAlester	40-121-0415	Pittsburg	8.7	7.9	8.0	8.7	8.2	8.2
Glenpool	40-143-0174	Tulsa	8.9	7.4	8.1	8.7	8.2	8.1
Tulsa	40-143-1127	Tulsa	9.1	8.2	9.1	8.6	8.8	8.7

*Based on uncertified data.