



REGION 8 ADMINISTRATOR

DENVER, CO 80202

The Honorable Greg Gianforte
Governor of Montana
P.O. Box 200801
Helena, Montana 59620-0801

Dear Governor Gianforte:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA or the Agency) intended approach for finalizing area designations for Montana for the 2024 primary annual fine particulate matter (PM_{2.5}) National Ambient Air Quality Standard (NAAQS or standard).

On February 7, 2024, the EPA promulgated a revised primary annual PM_{2.5} NAAQS of 9.0 micrograms per cubic meter (µg/m³).¹ The EPA's promulgation of the NAAQS initiated the designations process in accordance with Clean Air Act (CAA) section 107, which is intended to identify areas of the country as either meeting or not meeting the NAAQS.² Under CAA section 107(d)(1)(A), the Governor of each State was required to submit a list of initial designations for all areas in their State to the EPA by February 7, 2025. The EPA received a letter dated February 4, 2025 containing the list of initial area designations for Montana. The State of Montana submitted to the EPA an initial area designation of nonattainment for the Township of Libby, Montana, a designation of attainment for Fergus, Flathead, Lewis and Clark, Missoula, Powder River, Ravalli, Richland, Silver Bow, and Yellowstone Counties, and a designation of unclassifiable for the rest of the State.

On July 17, 2026, the Northern District Court of California ordered the EPA to publish final designations for all areas of the country no later than February 6, 2027.³ The EPA is appealing that court order. On November 24, 2025, the EPA filed a motion asking the U.S. Court of Appeals for the D.C. Circuit to vacate the 2024 PM_{2.5} NAAQS thereby relieving the EPA of

¹ 89 FR 16202 (Mar. 6, 2024).

² CAA section 107(d)(1)(A)(i)–(iii) defines: (i) nonattainment, any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the NAAQS, (ii) attainment, any area (other than an area identified in clause (i)) that meets the NAAQS, or (iii) unclassifiable, any area that cannot be classified on the basis of available information as meeting or not meeting the NAAQS. The EPA uses the category of attainment/unclassifiable for an area that is meeting the NAAQS and does not contribute to ambient air quality in a nearby area that does not meet the NAAQS.

³ *All. of Nurses for Healthy Env'ts v. Zeldin*, No. 26-cv-03118-HSG.

the obligation to make designations in furtherance of an unlawful standard. The D.C. Circuit subsequently upheld the 2024 PM_{2.5} NAAQS, but on August 28, 2026, State and industry petitioners filed two petitions with the United States Supreme Court for writ of certiorari, seeking to appeal that decision. Absent relevant action from the judiciary, the EPA intends to finalize designations for the 2024 annual PM_{2.5} NAAQS based on the most recent monitoring data (2023-2025 data) and any other relevant information available at that time. The majority of Governors' initial designations were based on 2021-2023 data. That being the case, we recognize that the EPA is evaluating two additional years of data beyond those that Governors had available at the time of their initial area designations submissions.

Our preliminary review of the 2023-2025 monitoring data indicates that your State has one or more monitors with design values that may not meet the 2024 annual PM_{2.5} NAAQS and/or that your State includes portions of a multi-State Core-Based Statistical Area or Combined Statistical Area that has one or more monitors with design values that may not meet the 2024 annual PM_{2.5} NAAQS. Without any further information or processing, such as a determination that air quality data was influenced by an exceptional event, these data could indicate that the area is not meeting the NAAQS and the area, including nearby areas that contribute to the area not meeting the NAAQS, may be designated as nonattainment. This outcome could be a modification of the State's initial area designation submitted February 4, 2025.

Certain events, including prescribed fires and wildfires, have the potential to impact air quality monitoring data across many regions of the country. Based on a screening analysis using the EPA's exceptional events technical tools, there are over 9,000 site days that could be submitted as Tier 1 or Tier 2 exceptional events, potentially affecting the design value at every monitor with a current 2023-2025 design value over 9 µg/m³. In addition, several States and organizations have communicated to the EPA that the Teledyne T640 and T640x PM mass monitors, which are prevalent in the southern and eastern parts of the U.S., have a high bias and are affecting the ability to evaluate attainment of the 2024 PM_{2.5} annual standard.⁴ The EPA is working to complete an assessment of the issues raised and any potential effect on the quality of the measurements. States can also request an exclusion of the monitoring data from being compared to the NAAQS if they demonstrate a high bias (*i.e.*, above 10%).⁵

⁴ See letter to the EPA from Enterprise Quality Management Division, titled "Request for Correction under the Information Quality Act of: (1) EPA's Approval of Four Modification Requests for the T640-T640x PM FEM Monitors; and (2) EPA's Retroactive Application of the Approved Modification of the T640 and T640X Monitors to Concentration Data for PM_{2.5} in EPA's Air Quality System (AQS)", dated January 6, 2026. Available at <https://www.epa.gov/system/files/documents/2026-01/nr3-rfc-1-6-26-c.pdf>.

See also letter to the Kansas Department of Health and Environment from The City of Kansas City, MO Office of Environmental Quality and Johnson County, KS Department of Health and Environment titled "Kansas PM_{2.5} NAAQS Designation Recommendations", dated January 28, 2025. Available at

<https://www.marc.org/sites/default/files/2025-01/PM-NAAQS-Designation-Recommendation-KDHE.pdf>

See also letter to the EPA from The Association of Air Pollution control Agencies, titled "RFC 26002 – Modification Requests for Federal Equivalent Methods (FEM) Monitors", dated March 12, 2026. Available at https://www.epa.gov/system/files/documents/2026-03/aapca-correspondence-for-rfc-26002_final_03-12-2026.pdf.

See also letter to the EPA from the Georgia Department of Natural Resources, titled "Georgia EPD Correspondence for RFC 26002 – Modification Requests for Federal Equivalent Methods (FEM) Monitors", dated April 15, 2026. Available at <https://www.epa.gov/quality/third-party-correspondence-rfc-26002>.

⁵ 40 CFR 58.11(e) and Appendix A to 40 CFR Part 58.

Given the expedited deadline that the EPA is operating under, the Agency acknowledges that the EPA may be lacking relevant information or demonstrations that would lead to a different designation. As a result, the EPA is notifying you that the Agency may designate the aforementioned areas attainment/unclassifiable if sufficient and appropriate information is received or becomes available prior to February 6, 2027, to support such a designation. This outcome would be a modification of the State's initial area designation submitted February 4, 2025.

Further, the Agency also recognizes the difficulties associated with gathering and processing the information necessary for the designation process within such an abbreviated timeline. As a result, it is possible that the Agency would determine that areas in your State cannot be classified on the basis of available information as meeting or not meeting the NAAQS, which would result in a designation of unclassifiable for areas in your State. This outcome would be a modification of the State's initial area designation submitted February 4, 2025.

If you have additional information that you would like the EPA to consider for final designations, including information related to exceptional events, please submit it to the public docket for these designations, EPA-HQ-OAR-2024-0078, located at www.regulations.gov. If you think any modification of your recommendation is not appropriate, please also provide reasoning as to why that is the correct outcome. Submission of this information no later than November 1, 2026, will help ensure the EPA has sufficient time to take this information into account in the Agency's final designation decision. Such additional information provided to the EPA could result in a designation of attainment/unclassifiable, nonattainment, or unclassifiable.

Should you have any questions, please contact me at (303) 312-6312. Alternatively, you may have a member of your staff reach out to Adrienne Sandoval at (720) 391-2147.

Sincerely,

MARK SMITH

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for Cyrus M. Western

cc: Rachel Green, Policy Director, Office of Governor
Christine Heggem, Chief of Staff, Office of Governor
Sonja Nowakowski, Director, Montana Department of Environmental Quality
Eric Merchant, Chief, Air Quality Bureau, Montana Department of Environmental Quality
Adrienne Sandoval, Director, Region 8 Air and Radiation Division, U.S. EPA

Enclosure 1:

Montana's Initial Area Designation Submission for the 2024 Annual PM_{2.5} NAAQS and Counties that Contain Violating Monitors

Identified Counties	Identified CBSA	State Initial Designation Category	State Initial Designation Boundary	Does the county contain a valid monitor with a DV that may not meet the NAAQS?	Is the county part of a CBSA that has a monitor located in another State that may not meet the NAAQS?
Lincoln County	Lincoln County	Nonattainment	Township of Libby, MT	Yes	No
Hill County	Havre, MT	Unclassifiable	Hill County	No*	No
Teton County	Teton County	Unclassifiable	Teton County	No*	No
Rest of State**	N/A	Unclassifiable, Attainment, Attainment/Unclassifiable	All counties in the rest of the State	N/A	N/A

* The State has one or more monitors with insufficient data to calculate a valid design value. The reasons for this may vary. EPA is flagging these counties as an opportunity for the State to provide additional information to inform final designations.

**The EPA intends to designate the rest of the State attainment/unclassifiable.