



**DEPARTMENT of AGRICULTURE  
and NATURAL RESOURCES**

JOE FOSS BUILDING  
523 E CAPITOL AVE  
PIERRE SD 57501-3182  
danr.sd.gov

December 13, 2024

KC Becker  
Regional Administrator  
U.S. Environmental Protection Agency, Region 8  
1595 Wynkoop Street  
Denver, CO 80202-1129

Dear Administrator Becker:

On February 7, 2024, EPA promulgated a revised primary annual National Ambient Air Quality Standard for particulate matter 2.5 microns in diameter or less (PM<sub>2.5</sub>) by reducing the annual average concentration level to 9 micrograms per cubic meter. Initial recommendations for area designations are due to EPA by February 7, 2025.

On December 22, 2021, Governor Noem submitted a letter to EPA Region 8 designating the Secretary of the Department of Agriculture and Natural Resources as her designee for submitting designations and other matters that involve South Dakota's Air Quality Program. In that capacity, I recommend EPA designate all counties in South Dakota as attaining the primary annual PM<sub>2.5</sub> standard (see Attachment A). Attachment B provides the technical analysis for designating all of South Dakota's counties as attaining the 2024 annual average standard for PM<sub>2.5</sub>.

Thank you for the opportunity to propose designations for the revised primary annual PM<sub>2.5</sub> standard. I look forward to your concurrence. If you have questions, please contact Kyrik Rombough of my staff at 605.773.3151.

Sincerely,

Hunter Roberts  
Secretary

Attachments

cc: Adrienne Sandoval, EPA Region 8 w/attachments

**Attachment A**  
**South Dakota Area Designations**  
**Revised 2024 Annual Average PM<sub>2.5</sub> Standard**

| <b>Designated Area</b>   | <b>Designation Type</b> |
|--------------------------|-------------------------|
| <b>Aurora County</b>     | Attainment              |
| <b>Beadle County</b>     | Attainment              |
| <b>Bennett County</b>    | Attainment              |
| <b>Bon Homme County</b>  | Attainment              |
| <b>Brookings County</b>  | Attainment              |
| <b>Brown County</b>      | Attainment              |
| <b>Brule County</b>      | Attainment              |
| <b>Buffalo County</b>    | Attainment              |
| <b>Butte County</b>      | Attainment              |
| <b>Campbell County</b>   | Attainment              |
| <b>Charles County</b>    | Attainment              |
| <b>Clark County</b>      | Attainment              |
| <b>Clay County</b>       | Attainment              |
| <b>Codington County</b>  | Attainment              |
| <b>Corson County</b>     | Attainment              |
| <b>Custer County</b>     | Attainment              |
| <b>Davison County</b>    | Attainment              |
| <b>Day County</b>        | Attainment              |
| <b>Deuel County</b>      | Attainment              |
| <b>Dewey County</b>      | Attainment              |
| <b>Douglas County</b>    | Attainment              |
| <b>Edmunds County</b>    | Attainment              |
| <b>Fall River County</b> | Attainment              |
| <b>Faulk County</b>      | Attainment              |
| <b>Grant County</b>      | Attainment              |
| <b>Gregory County</b>    | Attainment              |
| <b>Haakon County</b>     | Attainment              |
| <b>Hamlin County</b>     | Attainment              |
| <b>Hand County</b>       | Attainment              |
| <b>Hanson County</b>     | Attainment              |
| <b>Harding County</b>    | Attainment              |
| <b>Hughes County</b>     | Attainment              |
| <b>Hutchinson County</b> | Attainment              |
| <b>Hyde County</b>       | Attainment              |
| <b>Jackson County</b>    | Attainment              |
| <b>Jerauld County</b>    | Attainment              |
| <b>Jones County</b>      | Attainment              |
| <b>Kingsbury County</b>  | Attainment              |
| <b>Lake County</b>       | Attainment              |
| <b>Lawrence County</b>   | Attainment              |

| <b>Designated Area</b>      | <b>Designation Type</b> |
|-----------------------------|-------------------------|
| <b>Lincoln County</b>       | Attainment              |
| <b>Lyman County</b>         | Attainment              |
| <b>Marshall County</b>      | Attainment              |
| <b>McCook County</b>        | Attainment              |
| <b>McPherson County</b>     | Attainment              |
| <b>Meade County</b>         | Attainment              |
| <b>Mellette County</b>      | Attainment              |
| <b>Miner County</b>         | Attainment              |
| <b>Minnehaha County</b>     | Attainment              |
| <b>Moody County</b>         | Attainment              |
| <b>Oglala Lakota County</b> | Attainment              |
| <b>Pennington County</b>    | Attainment              |
| <b>Perkins County</b>       | Attainment              |
| <b>Potter County</b>        | Attainment              |
| <b>Roberts County</b>       | Attainment              |
| <b>Sanborn County</b>       | Attainment              |
| <b>Spink County</b>         | Attainment              |
| <b>Stanley County</b>       | Attainment              |
| <b>Sully County</b>         | Attainment              |
| <b>Todd County</b>          | Attainment              |
| <b>Tripp County</b>         | Attainment              |
| <b>Turner County</b>        | Attainment              |
| <b>Union County</b>         | Attainment              |
| <b>Walworth County</b>      | Attainment              |
| <b>Yankton County</b>       | Attainment              |
| <b>Ziebach County</b>       | Attainment              |

## Attachment B

### Determining Area Designations

On February 7, 2024, EPA promulgated a revised primary annual National Ambient Air Quality Standard for particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>). In accordance with Section 107(d)(1)(A) of the Clean Air Act, initial recommendations for area designations are due to EPA by February 7, 2025. EPA revised the primary PM<sub>2.5</sub> annual standard by reducing the three-year annual average concentration level to 9 micrograms per cubic meter.

The recorded three-year average PM<sub>2.5</sub> design value concentrations throughout South Dakota have not exceeded the revised annual standard from 2015 through 2023. Currently, the monitoring site with the highest annual average design value for PM<sub>2.5</sub> was recorded at the Watertown Site at 94% of the revised annual standard using data collected from 2021 to 2023. The Pierre Airport Site has the lowest design value concentration at 40% of the revised standard.

#### 1. Air Monitoring Data

DANR believes South Dakota's ambient air monitoring network is representative of the highest PM<sub>2.5</sub> concentration areas in the state. Table B-1 displays the three-year calculated design value concentration for each site using data from 2021 to 2023.

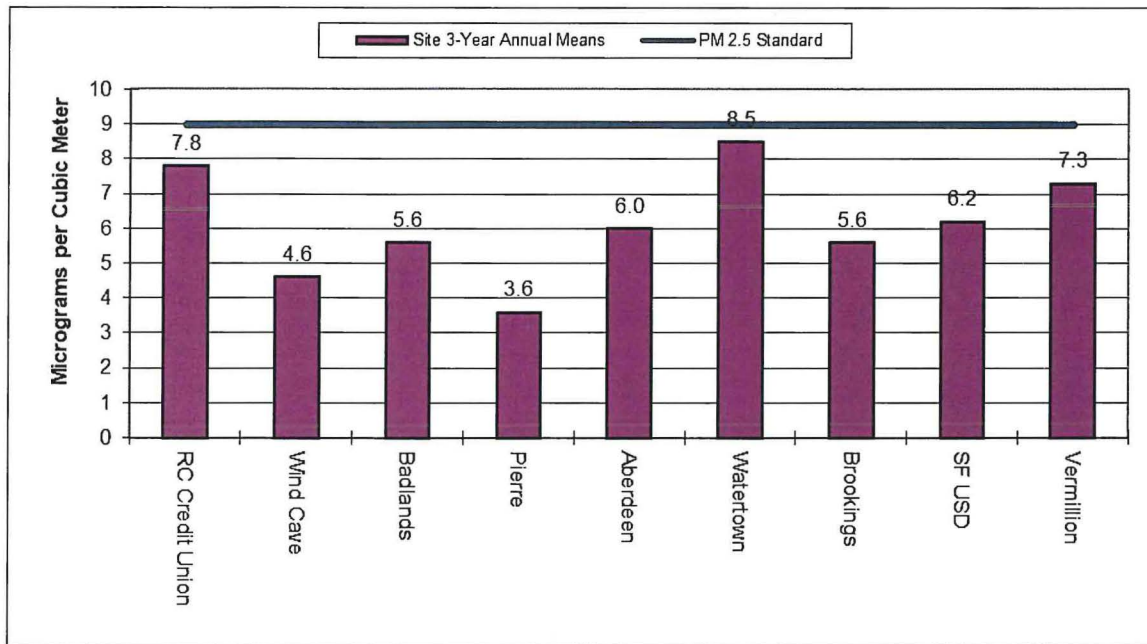
**Table B-1 – 2023 Site Design Values Concentrations in South Dakota**

| Site                    | Annual Averages                                                                              | 2023 Annual Design Values | Attainment Status |
|-------------------------|----------------------------------------------------------------------------------------------|---------------------------|-------------------|
| Watertown               | 2021 – 9.2 ug/m <sup>3</sup><br>2022 – 6.9 ug/m <sup>3</sup><br>2023 – 9.5 ug/m <sup>3</sup> | 8.5 ug/m <sup>3</sup>     | Yes               |
| Brookings Research Farm | 2021 – 6.7 ug/m <sup>3</sup><br>2022 – 3.7 ug/m <sup>3</sup><br>2023 – 6.4 ug/m <sup>3</sup> | 5.6 ug/m <sup>3</sup>     | Yes               |
| SF USD                  | 2021 – 7.2 ug/m <sup>3</sup><br>2022 – 4.7 ug/m <sup>3</sup><br>2023 – 6.9 ug/m <sup>3</sup> | 6.2 ug/m <sup>3</sup>     | Yes*              |
| Vermillion              | 2021 –<br>2022 – 6.0 ug/m <sup>3</sup><br>2023 – 8.7 ug/m <sup>3</sup>                       | 7.3 ug/m <sup>3</sup>     | Yes*              |
| Aberdeen Bus Stop       | 2021 – 6.7 ug/m <sup>3</sup><br>2022 – 4.2 ug/m <sup>3</sup><br>2023 – 7.0 ug/m <sup>3</sup> | 6.0 ug/m <sup>3</sup>     | Yes               |
| Pierre Airport          | 2021 – 3.9 ug/m <sup>3</sup><br>2022 – 1.9 ug/m <sup>3</sup><br>2023 – 5.2 ug/m <sup>3</sup> | 3.6 ug/m <sup>3</sup>     | Yes               |
| Badlands                | 2021 – 5.9 ug/m <sup>3</sup><br>2022 – 3.3 ug/m <sup>3</sup><br>2023 – 7.5 ug/m <sup>3</sup> | 5.6 ug/m <sup>3</sup>     | Yes               |
| Wind Cave               | 2021 – 4.8 ug/m <sup>3</sup><br>2022 – 4.4 ug/m <sup>3</sup><br>2023 – 4.8 ug/m <sup>3</sup> | 4.6 ug/m <sup>3</sup>     | Yes               |
| Rapid City Credit Union | 2021 – 8.1 ug/m <sup>3</sup><br>2022 – 7.0 ug/m <sup>3</sup><br>2023 – 8.4 ug/m <sup>3</sup> | 7.8 ug/m <sup>3</sup>     | Yes               |

\*Less than three complete years at SF USD and Vermillion sites.

Figure B-1 provides a graph comparison of the annual design values for each site using the 2021 to 2023 data compared to the 2024 revised annual PM<sub>2.5</sub> standard. As is demonstrated in the graph, all sites are attaining the revised annual PM<sub>2.5</sub> standard of 9 ug/m<sup>3</sup>.

**Figure B-1 – 2023 Design Values Compared to the Revised Annual PM<sub>2.5</sub> Standard**



\*Less than three complete years at SF USD and Vermillion