



Montana Department of
ENVIRONMENTAL QUALITY



Brian Schweitzer, Governor

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April 4, 2008

Callie Videtich
Air Program Director
USEPA, Region VIII
1595 Wynkoop St.
Denver, Colorado 80202-1129

RE: Minimum criteria for PM-2.5 NAAQS and SIP adequacy

Dear Ms. Videtich:

Pursuant to a Consent Decree (CD) issued in the matter of Environmental Defense v. Johnson, EPA agreed to make certain determinations, including whether states submitted elements into their respective State Implementation Plans (SIPs) meeting the minimum criteria under 42 USC §7410(a) within the statutory time period of EPA's promulgation of the July 18, 1997 National Ambient Air Quality Standard (NAAQS) for PM-2.5. EPA agreed with plaintiffs to make these determinations by April 4, 2008. EPA then requested assistance from each state in its efforts to finalize its determination by the CD deadline.

On March 17, 2000, the Montana Board of Environmental Review made revisions to the Administrative Rules of Montana (ARM). June 28, 2000, Montana submitted these amendments to EPA for inclusion into the SIP. These rules were amended to ensure the adequacy of Montana's SIP regarding the infrastructure-related elements of 42 USC §7410(a). At that time, Montana certified its SIP was adequate with respect to the then-existent PM-2.5 NAAQS.

EPA recently promulgated a direct final action approving this particular submission. 73 FR 10150. Notwithstanding the projected date finalizing this submission for procedural reasons, Montana's SIP was substantively adequate as of March 17, 2000 for the purpose of assuring compliance with the 1997 PM-2.5 NAAQS.

If you have questions or require further information regarding this matter, please call Debra Wolfe at 406-444-7916 or email her at dwolfe@mt.gov.

Sincerely,

Dave Klemp, Chief
Air Resources Management Bureau