

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR KIM REYNOLDS, LT. GOVERNOR DEPARTMENT OF NATURAL RESOURCES ROGER L. LANDE, DIRECTOR

September 7, 2011

Mr. Karl Brooks, Regional Administrator U.S. EPA Region VII 901 North 5th Street Kansas City, KS 66101

Dear Mr. Brooks:

In a letter dated January 25, 2011, the state of Iowa submitted designation recommendations for the revised 2010 primary National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂). This letter is being submitted to provide clarification concerning the size of the designated area as recommended by the State of Iowa in that letter. The state of Iowa also recognizes EPA's intent, as provided in a June 28, 2011 letter, to initially designate all areas in Iowa as "unclassifiable/attainment."

To ensure that the size of the designated area is consistent with the State of Iowa's objectives for meeting air quality prevention of significant deterioration and economic growth goals, it is recommended that each of the 99 counties in Iowa be designated individually as "unclassifiable/attainment" until the Environmental Protection Agency (EPA) redesignates areas, as appropriate after sufficient air quality data from the new monitoring network are available.

Thank you for your response letter concerning our initial recommendations and for the opportunity to provide this additional clarification. Please feel free to contact Catharine Fitzsimmons, Chief of the Air Quality Bureau, at 515-281-8034 or catharine.fitzsimmons@dnr.iowa.gov if you have any questions regarding this clarification.

Sincerely.

Roger L. Lande, Director

Iowa Department of Natural Resources

c: Bill Ehm, Division Administrator, ESD Catharine Fitzsimmons, Chief, Air Quality Bureau