



CHESTER J. CULVER
GOVERNOR

OFFICE OF THE GOVERNOR

PATTY JUDGE
LT. GOVERNOR

October 20, 2008

John B. Askew
Region VII Administrator
U.S. Environmental Protection Agency
901 North Fifth Street
Kansas City, KS 66101

Dear Mr. Askew:

The State of Iowa respectfully submits this letter and accompanying materials in response to the U.S. Environmental Protection Agency (EPA) proposed designations for the 24-hour PM_{2.5} National Ambient Air Quality Standard. On August 18th, 2008, the EPA responded to the State of Iowa's recommendations regarding the attainment status for 24-hour fine particulate matter concentrations in Scott and Muscatine Counties. After careful consideration of EPA's comments, and additional technical analysis, Iowa requests that EPA modify the proposed nonattainment boundaries from county or multiple county levels to sub-county levels for both the Scott County and Muscatine County areas. The technical support document attached to this letter provides an extensive analysis of the local and regional factors impacting the two violating monitors, and further supports the State's position that emissions reductions at specific local sources will remedy the violations.

I share your concerns that fine particulate matter pollution represents one of the most significant barriers to clean air facing our nation today. The significant health threats associated with fine particulate matter have driven our efforts to achieve clean air in eastern Iowa at an accelerated rate that greatly surpasses the regulatory timelines provided for in the Clean Air Act.

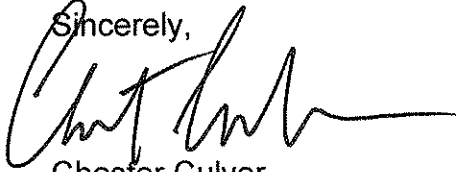
Iowa is committed to attaining and maintaining the National Ambient Air Quality Standards for fine particulates in eastern Iowa as expeditiously as possible. This goal must be supported through appropriate action and by sound decisions. The use of technical information derived from accurate data, scientific methods, and sound reasoning is paramount in achieving our goals. In consultation and coordination with EPA Region VII and the Illinois EPA, IDNR has undertaken an intensive investigation to support appropriate modifications to EPA's proposed boundaries. The enclosed Technical Support Document is intended to provide you with a roadmap that provides



clear and convincing technically and scientifically sound information to support your modification of the proposed nonattainment boundaries to include only limited parts of Muscatine and Scott Counties. Further, it is our hope that by submitting 2008 monitoring data for these areas early in 2009, that nonattainment area designations will be able to be withdrawn before they are finalized.

Thank you for the opportunity to provide you with this additional information, and for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Chester Culver", written in a cursive style.

Chester Culver
Governor

Enclosures