



OFFICE OF THE GOVERNOR

TERRY E. BRANSTAD  
GOVERNOR

KIM REYNOLDS  
LT. GOVERNOR

January 25, 2011

Karl Brooks  
Regional Administrator  
Region VII, U.S. Environmental Protection Agency  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

Dear Administrator Brooks:

Under the provisions of section 107(d)(1)(A) of the Clean Air Act, one year after EPA promulgates a new National Ambient Air Quality Standard (NAAQS), the Governor of each State must review the most recent monitoring data and classify all areas of their State as "attainment," "nonattainment" or "unclassifiable" with respect to the new standard. EPA reviews these recommendations (along with any additional monitoring data) and makes initial designations within two years of promulgation of the NAAQS.

On January 22, 2010, the U.S. Environmental Protection Agency (EPA) promulgated a new NAAQS for nitrogen dioxide (NO<sub>2</sub>).<sup>1</sup> To meet this new health-based standard, a monitor must measure a 3-year average of the 98<sup>th</sup> percentile daily maximum 1-hour concentration (design value) of 100 ppb or less. Monitored levels are expected to be highest near major roadways, and the NAAQS included a requirement to install near-roadway monitors by January 2013.

Iowa currently has two NO<sub>2</sub> monitors, one in Des Moines and one in Davenport. These two monitors have recorded design values that are considerably less than the new 100 ppb NO<sub>2</sub> NAAQS.

Monitoring Location	Monitor ID	One-Hour NO <sub>2</sub> Design Value (ppb)	Monitoring Period
Davenport, Jefferson School	191630015	38	2007-2009
Des Moines, Public Health Building	191530030	41	2007-2009

However, these monitors were sited to measure population exposure in a typical neighborhood, not the near roadway environment that is the focus of the new rule. These existing monitors do not provide adequate evidence to establish whether or not the new NAAQS is met at other locations, especially those closer to NO<sub>2</sub> emission sources such as roadways.

I therefore recommend that all Iowa counties be designated as "unclassifiable" with respect to the new NO<sub>2</sub> NAAQS. I trust that after installation of the required near roadway monitor in Des Moines in 2013, we will be able to provide you with more meaningful information about the quality of Iowa's air relative to EPA's new health standard.

Sincerely,

Terry E. Branstad  
Governor of Iowa

<sup>1</sup> 75 FR 6474, February 9, 2010