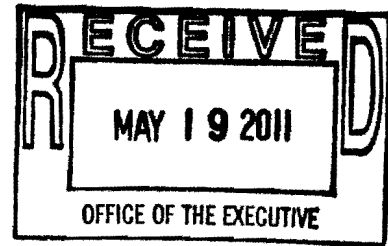




STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY



1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

May 16, 2011

Dennis McLerran
Regional Administrator
EPA Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Dear Mr. McLerran:

On behalf of the Governor of the State of Idaho and as the Director of the Idaho Department of Environmental Quality (DEQ), I am submitting Idaho's recommendations for area designations related to the recently revised Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS).

On June 2, 2010, the U.S. Environmental Protection Agency (EPA) revised the health-based primary National Ambient Air Quality Standard (NAAQS) for SO₂ by establishing a new 1-hour standard at a level of 75 parts per billion (ppb). In the same action EPA revoked the two existing primary standards of 140 ppb evaluated over 24-hours, and 30 ppb evaluated over an entire year because they will not add additional public health protection given a 1-hour standard at 75 ppb.

The revised SO₂ standard includes a new "form." The new form is the 3-year average of the 99th percentile of the annual distribution of daily maximum 1-hour average concentrations.

EPA anticipates initially designating areas based on 2008-2010 monitoring data, or refined dispersion modeling results if provided by the state. Areas which violate the standard would be designated as "nonattainment". Areas that have both monitoring data and appropriate refined modeling results showing no violations would be designated as "attainment." All other areas would be designated as "unclassifiable."

Per your letter received by DEQ on March 24, 2011 EPA does not expect states to complete modeling for all significant sources of SO₂ and assess the results in time for the designation recommendations due to EPA by June 3, 2011.

DEQ has monitored SO₂ for a number of years in Caribou (AQS ID 160290031) and Bannock County (AQS ID 160050004). The 2008-2010 design values for these two monitors are 53 ppb and 60 ppb, respectively (please note: 2010 data is not yet certified).

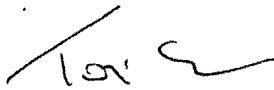
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To date DEQ has not modeled significant sources of SO₂ to determine compliance with the new 1-hour standard. The Clean Air Act (CAA) directs states to submit by June 3, 2013 a State Implementation Plan (SIP) demonstrating an adequate program to implement, maintain and enforce the SO₂ NAAQS. In light of the lack of modeling data available at this time, DEQ plans to include in this plan a demonstration of expeditious attainment and maintenance of the SO₂ NAAQS.

On this basis, and on behalf of the Governor of the State of Idaho, C.L. "Butch" Otter, I am recommending that the entire State of Idaho and all of Idaho's Air Quality Control Regions (AQCRs 61,62,63 and 64) be designated as unclassifiable for the one-hour SO₂ NAAQS.

If EPA has any further questions or concerns, please coordinate through Martin Bauer, Air Quality Division Administrator of DEQ (208/ 373-0552).

Sincerely,

A handwritten signature in black ink, appearing to read "Toni Hardesty", with a stylized flourish at the end.

Toni Hardesty
Director

c: Governor C.L."Butch" Otter