



**DEPARTMENT of ENVIRONMENT
and NATURAL RESOURCES**

PMB 2020
JOE FOSS BUILDING
523 EAST CAPITOL
PIERRE, SOUTH DAKOTA 57501-3182
denr.sd.gov

October 15, 2009

Ms. Carol Rushin
Acting Regional Administrator
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

RE: Proposed Area Designations for the 2008 revised Lead Standard

Dear Ms. Rushin:

Thank you for your letter asking Governor Rounds to provide the Environmental Protection Agency (EPA) with recommendations for designation of areas of the state for the October 15, 2008 revised lead National Ambient Air Quality Standard. Governor Rounds has delegated the authority to determine and submit designations for South Dakota to the Secretary of the South Dakota Department of Environment and Natural Resources (DENR). Therefore, I am submitting the proposed designations on the Governor's behalf.

As provided by Section 107(d) (1) (A) of the Clean Air Act, I propose that all counties in South Dakota be designated in attainment for the 2008 revised lead standard (See Attachment 1). I propose the designations for the following reasons:

- DENR reviewed 2008 Toxic Release Inventory report of air quality emission. Data received from the facilities in South Dakota in the 2008 Toxic Release Inventory report shows that all facilities have yearly emission of less than one ton of lead per year. Therefore, the potential to exceed the national standard remains low from facilities in the state (See Attachment 2).
- DENR reviewed past air monitoring data collected in the state to determine proposed county designations. Two types of air monitoring data were found in the EPA Air Quality System data base for lead. The first type was lead concentrations analyzed from total suspended particulates samples. The reported quarterly lead averages are all less than the revised standard. Following the removal of most of the lead from gas and because the potential was low for finding lead concentrations greater than the national standard, the DENR closed down the last lead monitoring site in 1994.

- The second type has data from PM2.5 samples analyzed for lead concentrations taken in the Badlands and Wind Cave National Parks and the PM2.5 speciation sampling site in Sioux Falls, South Dakota. Lead concentration analyzed from the PM2.5 samples provide a good indicator of pollution coming from combustion sources. All sample concentrations reported in the EPA Air Quality System database are less than the revised lead standard.
- Air quality emissions of lead are low in South Dakota. During the years when leaded gas was sold, DENR operated monitoring sites testing for lead concentrations. None of the data collected in those years exceeded the lead standard. The combination of the state's low population, small number of facilities, and low lead emissions from those facilities keeps the ambient air quality concentrations below the lead standard. Currently, the only testing for lead concentrations is the chemical speciation of PM2.5 samples collected at the Badlands and Wind Cave National Parks and a site in Sioux Falls.

Thank you for allowing South Dakota to propose designations for the 2008 revised lead standard. If you have questions on this notice, please contact Brian Gustafson at 605-773-3151 for more information.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Pirner", with a horizontal line underneath.

Steven M. Pirner
Secretary

Enclosures

cy: Callie Videtich, EPA Region 8

Attachment 1

South Dakota County Designations

Lead Standard

South Dakota – Lead Standard

Designated Area	Designation
	Type
Aurora County	Attainment
Beadle County	Attainment
Bennett County	Attainment
Bon Homme County	Attainment
Brookings County	Attainment
Brown County	Attainment
Brule County	Attainment
Buffalo County	Attainment
Butte County	Attainment
Campbell County	Attainment
Charles County	Attainment
Clark County	Attainment
Clay County	Attainment
Codington County	Attainment
Corson County	Attainment
Custer County	Attainment
Davison County	Attainment
Day County	Attainment
Deuel County	Attainment
Dewey County	Attainment
Douglas County	Attainment
Edmunds County	Attainment
Fall River County	Attainment
Faulk County	Attainment
Grant County	Attainment
Gregory County	Attainment
Haakon County	Attainment
Hamlin County	Attainment
Hand County	Attainment
Hanson County	Attainment
Harding County	Attainment
Hughes County	Attainment
Hutchinson County	Attainment

Designated Area	Designation
	Type
Hyde County	Attainment
Jackson County	Attainment
Jerauld County	Attainment
Jones County	Attainment
Kingsbury County	Attainment
Lake County	Attainment
Lawrence County	Attainment
Lincoln County	Attainment
Lyman County	Attainment
Marshall County	Attainment
McCook County	Attainment
McPherson County	Attainment
Meade County	Attainment
Mellette County	Attainment
Miner County	Attainment
Minnehaha County	Attainment
Moody County	Attainment
Pennington County	Attainment
Perkins County	Attainment
Potter County	Attainment
Roberts County	Attainment
Sanborn County	Attainment
Shannon County	Attainment
Spink County	Attainment
Stanley County	Attainment
Sully County	Attainment
Todd County	Attainment
Tripp County	Attainment
Turner County	Attainment
Union County	Attainment
Walworth County	Attainment
Yankton County	Attainment
Ziebach County	Attainment

Attachment 2

Toxic Release Inventory
2008 Data

Toxic Release Inventory Database 2008
Air emissions inventory for Lead

Company Name	City	Year	Chemical Name	Fugitive Emissions	Stack Emissions	Totals
				Pounds	Pounds	Pounds
Angus-Palm Industries, Inc.	Watertown	2008	Lead	0.00	0.00	0.00
Banner Engineering Corporation	Aberdeen	2008	Lead	0.00	0.00	0.00
Banner Engineering Corporation	Huron	2008	Lead	0.00	0.00	0.00
Black Hills Corporation - Ben French Pow	Rapid City	2008	Lead	0.03	8.00	11.03
DTS Incorporated	Tea	2008	Lead	0.00	0.00	0.00
Daktronics, Inc - Sioux Falls	Sioux Falls	2008	Lead	0.20	4.10	4.30
Daktronics, Inc.	Brookings	2008	Lead	0.20	4.30	4.50
Electronic Systems Inc	Sioux Falls	2008	Lead	0.00	0.00	0.00
GCC Dacotah	Rapid City	2008	Lead	1.96	56.60	58.56
Graco, Inc.	Minneapolis	2008	Lead	2.00	0.00	2.00
Hi Roller Conveyors	Sioux Falls	2008	Lead	0.00	0.00	0.00
L & M RADIATOR	YANKTON	2008	Lead	0.00	1.00	1.00
Pace Manufacturing, Inc.	Brandon	2008	Lead	0.00	0.00	0.00
Star Circuits, Inc.	Brookings	2008	Lead	0.00	0.00	0.00
Starmark, Inc.	Sioux Falls	2008	Lead	0.00	0.07	0.07
The Freeman Company Aviation Mfg Grp AMG	Yankton	2008	Lead	0.00	0.00	0.00
Ultramax Ammunition	Rapid City	2008	Lead	0.00	0.00	0.00
3M Health Care-Brookings Plant	Brookings	2008	Lead Compounds	0.00	0.00	0.00
Big Stone Power Plant - Ottertail	Big Stone City	2008	Lead Compounds	9.70	75.80	87.90
John Morrell & Company	Sioux Falls	2008	Lead Compounds	0.00	4.39	687.89
OEM Worldwide	Watertown	2008	Lead Compounds	0.00	0.00	0.00
Pete Lien & Sons, Inc.	Rapid City	2008	Lead Compounds	1.90	0.22	2.12