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

December 17, 2010

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

Dear Mr. McClerran:

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 Nitrogen Dioxide (NO₂) National Ambient Air Quality Standard (NAAQS).

On January 22,2010, the U.S. Environmental Protection Agency (EPA) strengthened the health-based National Ambient Air Quality Standard (NAAQS) for NO₂ by supplementing the existing standard of 53 parts per billion (ppb) with a 1-hour primary standard of 100 ppb (3-year average of the 98th percentile daily maximum 1-hour concentration; 75 FR 6474, February 9, 2010).

Per your letter received November 10, 2010, "States and tribes should base their recommendations on the latest available NO₂ monitoring data, which we expect will be from 2007-2009 or 2008-2010". After 2006 and until 2009, when DEQ began monitoring NO₂ year-round at the Meridian NCore site, NO₂ monitoring has mostly been conducted during ozone season. There are some "complete" years of NO₂ data at two monitoring sites prior to 2006, but no 3-year data sets are available. Therefore DEQ does not have adequate data to make any designations other than unclassifiable.

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 both the annual and one-hour NO₂ NAAQS.

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

Sincerely,

Toni Hardesty

Director

Cc: Governor Butch Otter

Katie Brodie, Governor's Office