



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

September 30, 2009



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

Michelle Pirzadeh,
Acting Regional Administrator
USEPA, Region 10
1200 Sixth Avenue, Suite 900
Mail Code: RA-140
Seattle, WA 98101

Dear Ms. Pirzadeh:

On behalf of Governor C. L. "Butch" Otter of Idaho and as the director of the Idaho Department of Environmental Quality (DEQ), I am submitting to you Idaho's recommendations for area designations for the 2008 revised lead (Pb) National Ambient Air Quality Standard (NAAQS).

Section 107(d)(1) of the Clean Air Act defines an area as nonattainment if it is violating a NAAQS or contributing to a violation in a nearby area. Core Based Statistical Area (CBSA) or Combined Statistical Areas (which includes two or more CBSAs) associated with violating monitor(s) serve as the starting point or "presumptive" boundary for the geographic extent of a nonattainment area. For rural areas the presumption is that the designation will be made for the entire county in which the monitor is located.

In a recent memo from William Harnett to EPA Regional Administrators, Mr. Harnett states that "EPA recommends states use the most recent three consecutive years of quality assured, certified air quality data. In most cases, EPA expects these data to be from 2006-2008 that are stored in the EPA Air Quality System (AQS)." DEQ has not monitored lead in total suspended particulate matter (TSP) since 2002, at the Kellogg Medical Center in Kellogg, Idaho (AQS Site ID 160790006). The last three consecutive years of complete data collected at this site were 1999-2001. For these data, the highest rolling quarterly average was $0.076 \mu\text{g}/\text{m}^3$, approximately 50 percent of the 2008 primary and secondary NAAQS, $0.15 \mu\text{g}/\text{m}^3$. This site was terminated, with EPA's approval, because of a long-term downward trend in lead concentrations well below the former lead NAAQS of $1.5 \mu\text{g}/\text{m}^3$.

Based on the above, and on behalf of Governor Otter, I am recommending that the entire state of Idaho be designated as unclassifiable for the 2008 lead NAAQS.

DEQ does not have facilities exceeding the one-ton-per-year threshold as defined in the 2008 lead NAAQS and will not implement source-oriented lead monitoring required January 1, 2010. According to the 2008 Pb NAAQS, DEQ will be required to implement the population-oriented lead monitoring requirement beginning January 1, 2011, in the Treasure Valley.

Depending on the outcome of EPA's reconsideration of the 2008 NAAQS, if the source emissions threshold triggering source oriented monitoring is lowered to ≥ 0.5 tons per year, DEQ will still not be required to implement source-oriented lead monitoring. If EPA increases the urban area population threshold from 500,000 to 1,000,000, DEQ will not meet this requirement for any urban areas in Idaho, and no population-based lead monitoring will be required.

If EPA has any further questions or concerns, please contact Martin Bauer, Air Quality Division Administrator, at (208) 373-0552 or martin.bauer@deq.idaho.gov.

Sincerely,



Toni Hardesty
Director

cc: Governor Butch Otter
Katie Brodie, Office of the Governor