



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 15, 2020

Chris Hladick
Regional Administrator
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155 (M/C 21-B03)
Seattle, Washington 98101

RE: Updated Washington State Designation Recommendation for the 2010 Sulfur Dioxide National Ambient Air Quality Standard, for Chelan and Douglas Counties.

Dear Administrator Chris Hladick:

As the Governor's Designee for the Washington State Implementation Plan (SIP), I am submitting an update to the state's 2011 designation recommendation for the one-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard, (NAAQS) for Chelan and Douglas Counties. I recommend that the Environmental Protection Agency (EPA) designate these two counties to be in attainment of the SO₂ NAAQS.

Consistent with EPA requirements, the Washington State Department of Ecology (Ecology) evaluated ambient levels of SO₂ near Alcoa Metal Works Wenatchee (Alcoa). Alcoa is an aluminum smelter in Chelan County that sits on the border with Douglas County and can emit more than 2000 tons of SO₂ per year.

In 2016, Alcoa curtailed its operations in Wenatchee. Though not operating, the facility continues to maintain its permit allowing SO₂ emissions. Therefore Ecology continued its evaluation and conducted three years of ambient monitoring near Alcoa.

Ecology collected SO₂ data from 2017 through 2019 at the Malaga monitoring site located near the Alcoa facility. Based on the three years of data, Ecology determined that Malaga's SO₂ design value is 1 part per billion. The design value of 1 ppb is substantially below the standard of 75 ppb, indicating that the area is in attainment.

Ecology's Air Quality Program ensured the data collected from the industry-operated monitor complied with all 40 CFR Part 58 requirements, as well as Ecology's quality assurance plan and standard operating procedures. Ecology has validated the collected ambient monitoring data, certified it and submitted it to EPA attesting to data completeness and accuracy via EPA's Air Quality System. It is my understanding that EPA will review the monitoring data and publish a formal design value for the Malaga monitoring site sometime in July 2020, where the public can review it.

Administrator Chris Hladick

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There are no other industrial sources of SO₂ in Chelan County. In Douglas County, Ecology permits SO₂ emissions from the Greater Wenatchee Regional Landfill & Recycling Center. Its annual SO₂ emissions between 2011 and 2017 averaged 4.8 tons, with a maximum of 6.2 tons in 2016. This is well below EPA's threshold of 2,000 tons of SO₂ emissions a year to be considered for SO₂ evaluation. Between the extremely low design value at the Malaga monitoring site and only one other small SO₂ source in the two counties, Ecology has no evidence to suspect any area in the two counties is in violation of the SO₂ standard. Ecology recommends the two counties be designated as being either in attainment, or attainment/unclassifiable.

Should Alcoa restart its operations and increase its emissions, Ecology will follow the Data Requirements Rule to ensure an ongoing verification of the attainment status, through monitoring or modeling.

Ecology met all state and federal procedural requirements for collecting public input on the proposed recommendation. Ecology posted public comment and hearing notices. Copies of the notices are enclosed. Ecology held the public comment period from May 15, 2020 through June 24, 2020. We did not receive comments. We did not hold a hearing because we did not receive a request for one.

If you have any questions, please contact Martha Hankins, Air Quality Policy and Planning Section Manager at Martha.Hankins@ecy.wa.gov or (360) 742-9601.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Watson', is written over a horizontal line.

Laura Watson
Director

Enclosure: Public Notice SO₂ Designation Recommendation for Chelan and Do