



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
John H. Tippetts, Director

January 13, 2016

Jan Hastings, Acting Director Air Waste and Toxics
USEPA Region 10, MS RA-140
1200 Sixth Avenue
Seattle, WA 98101

RE: Response to 2015 Data Requirements Rule for the 2010 1-hour SO₂ NAAQS

Dear Ms. Hastings:

The Idaho Department of Environmental Quality (DEQ), as required by the Data Requirements Rule (DRR) for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS) [August 21, 2015 (80 FR 51052)], has reviewed the SO₂ emissions for 2014 (the most recent year available) and has determined that there are no facilities in Idaho that require air quality characterization.

The DRR requires states *"to submit a list to EPA by January 15, 2016, that identifies all sources within its jurisdiction that have SO₂ emissions that exceeded the 2,000 tons per year (tpy) annual threshold during the most recent year for which emissions data for that sources are available, plus any additional sources and their associated areas identified by the air agency or by the EPA as also warranting air quality characterization."*

For those areas where sources with emissions above 2,000 tpy, or facilities the air agency or EPA believe warrant addition characterization, the air agency would be *"required to indicate by July 1, 2016, whether it will characterize air quality through ambient monitoring or through air quality modeling or alternative, whether it will be subjecting the pertinent source or sources to emission limits(s) that will keep the source(s) below the rule's 2,000 tpy threshold."*

Table 1 presents the last four years of actual SO₂ emissions from Idaho's top 6 emission sources. The data shows that these sources have not exceeded 2,000 tpy of SO₂ during these years, including the most recent year for which emissions data are available (2014). In addition to the fact that the emissions are below the 2,000 tpy threshold, the sources are also geographically distributed throughout southern Idaho, as can be seen on the map in Figure 1.

Table 1. Idaho's Top 6 SO₂ Emission Sources 2011-2014

Facility	Name	2011 TPY	2012 TPY	2013 TPY	2014 TPY
08300001	Amalgamated Sugar (TASCO -Twin Falls)	1449	862	1293	1083
02700010	Amalgamated Sugar (TASCO – Nampa) ^a	1660	819	1893	1586
06700001	Amalgamated Sugar (TASCO – Paul)	357	248	226	248
07700006	JR Simplot Company – Don Siding	1648	1564	803	795
02900003	NU-West Industries, Inc. (Agrium Conda Phosphate)	303	312	411	332
02900001	P4 Production LLC (TV Facility)	1169	643	615	456

a. TASCO Nampa has submitted an application to convert the two B&W Boilers from coal to natural gas exclusively. For the 2014 emissions, this would result in a reduction of about 560 tpy.

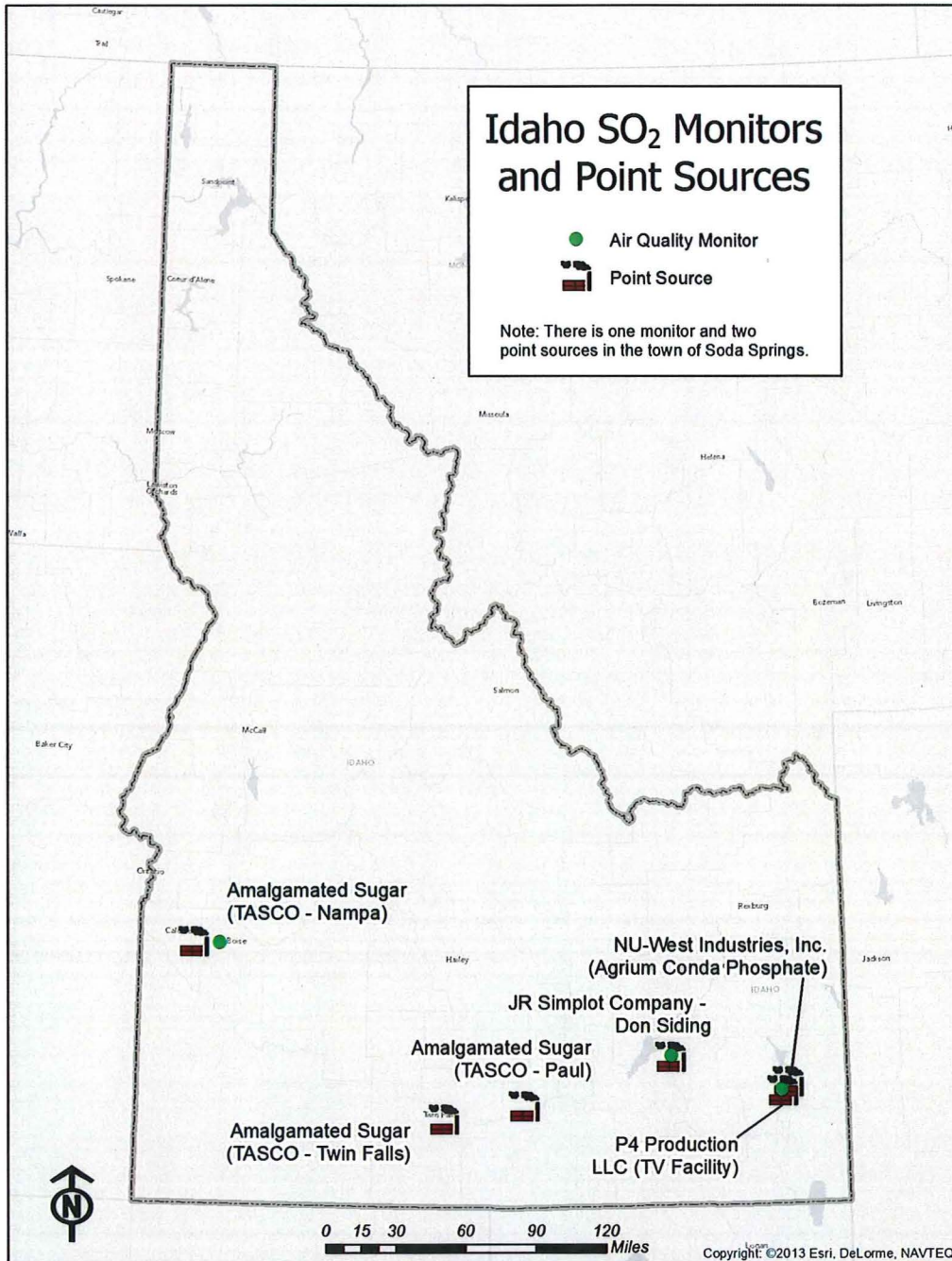


Figure 1 SO₂ emission sources and monitor locations

DEQ operates 3 regulatory SO₂ monitors in south Idaho. Table 2 shows that 1-hour SO₂ concentrations have decreased from the 2008-2010 period. As seen in Figure 1, DEQ operates a SO₂ monitor near 4 of the 6 top emission sources. The Pocatello and Soda Springs monitors are located where it was determined the largest stationary source emissions would have the maximum impact, aka “hot spots”. The Meridian monitor is located at the NCORE site, which is representative of the Treasure Valley Airshed (which includes Ada and Canyon Counties).

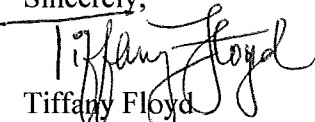
Site	County - AQS ID	99 th Percentile – Highest Daily Maximum 1- hour Average			3-Year Design Value	
		2012	2013	2014	2012-2014	2008-2010
Pocatello	Bannock - 160050004	73	40	38	51	53
Soda Springs	Caribou - 160290031	35	31	23	30	60
Meridian	Ada - 160010010	6	11	5	7	N/A

Based on the fact Idaho’s SO₂ sources are below the 2,000 tpy threshold of needing additional characterization, the noted decrease in the 3-year design value, and the spatial distribution of the sources, Idaho has determined there is no need to further analyze the sources listed in Table 1, or any other sources in Idaho. Any new source or modification of an existing source would be required to demonstrate compliance with all NAAQS, per DEQ’s permitting program requirements.

In addition since the existing monitors in Bannock and Caribou County are located in areas predicted to have the maximum ambient concentrations, the monitor in Ada County is located in an area representative of the Treasure Valley airshed, and the design values demonstrate attainment; DEQ requests Ada, Canyon, Bannock, and Caribou Counties be designated attainment and the rest of the state be designated unclassifiable.

If you have any further questions or would like additional information, please contact Mary Anderson, at (208) 373-0202 or Mary.Anderson@deq.idaho.gov.

Sincerely,



Tiffany Floyd
Administrator

cc: Mary Anderson, Program Manager
Debra Suzuki, USEPA Region 10, Air Planning Unit Manager