



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 28, 2016

Janis Hastings, Associate Director
Office of Air, Waste, and Toxics
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: Identifying approach to evaluating levels of sulfur dioxide (SO₂) air pollution around three facilities in Washington State.

Dear Ms. Hastings:

In January 2016, Washington State Department of Ecology (Ecology) identified three large sources of SO₂ emissions in Washington as subject to EPA's Data Requirements Rule for the 2010 1-Hour SO₂ Primary National Ambient Air Quality Standard (NAAQS). Under the rule, Ecology must characterize the area around the sources, using either monitoring or modeling approach, for determining whether the area attains the 2010 SO₂ NAAQS.

In March 2016, EPA concurred with the Ecology's proposed list of sources for evaluation. The table below specifies which approach Ecology will use to characterize the SO₂ concentrations around each of the three facilities.

Facility Name	Lat	Long	FIPS	County	Monitoring or Modeling?
Intalco Aluminum Corporation (Formerly Alcoa Primary Metals Intalco Works)	48.84699	122.70589	53073	Whatcom	Monitoring
Alcoa Wenatchee LLC (Formerly Alcoa Primary Metals Wenatchee Works)	47.35847	120.13121	53007	Chelan	Monitoring
TransAlta Centralia Generation, LLC	46.7558	122.8565	53041	Lewis	Modeling

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For the two aluminum smelters, Ecology proposes to add new SO₂ ambient air monitors to the state network. Ecology will provide details about the number and location of the new SO₂ monitors in the 2016 Ambient Air Monitoring Network Report. Ecology will submit the report to EPA following the public comment period on or before July 1, 2016. Ecology appreciates Region 10 staff time and participation in the preliminary discussions and review of the proposed monitoring site locations.

Attached to this letter is the modeling protocol Ecology intends to use for modeling concentrations of SO₂ in the ambient air around TransAlta Centralia power plant. We are submitting this modeling protocol to you for your approval.

Ecology will use the modeling and monitoring results to develop recommendations to EPA on whether each area attains the SO₂ standard. For non-monitored areas, Ecology intends to submit its recommendation to EPA ahead of the January 13, 2017 deadline. Ecology will provide its recommendation to EPA for the monitored areas around the smelters after we collect three years of monitoring data (2017 – 2019).

If you have any questions about this letter, please contact Anya Caudill at anya.caudill@ecy.wa.gov or 360-407-6630.

Sincerely,

A handwritten signature in blue ink that reads "Stuart A. Clark".

Stuart A. Clark, Manager
Air Quality Program

Enclosure: Modeling Protocol

Scanned copy of the letter emailed to:

Debra Suzuki, EPA Region 10
Uri Papish, Southwest Clean Air Agency
Mark Asmundson, Northwest Clean Air Agency
Maia D. Bellon, Director
Garin Schrieve, Ecology
David Nicol, EH&S Manager, TransAlta Centralia Generations LLC
Kathryn Mitchell, Intalco Alcoa Environmental Manager
David Hulse, Alcoa Wenatchee Environmental Manager