UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF THE REGIONAL
ADMINISTRATOR

AUG 2 2 2017

The Honorable C.L. Butch Otter
Office of the Governor
State Capitol
P.O. Box 83720
Boise, Idaho 83720

Dear Governor Otter:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for certain areas in Idaho for the 2010 Primary National Ambient Air Quality Standard for sulfur dioxide (SO_2). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated May 19, 2011, and January 19, 2016.

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016, and November 29, 2016. In Idaho, there were no areas designated in these previous actions. Pursuant to a March 2, 2015, court-ordered schedule,[1] the agency must complete the remaining SO_2 designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for Idaho. We are in general agreement with your recommendation.

If you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible, but no later than October 23, 2017. You may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to the EPA, Region 10. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

Idaho has recommended a designation of unclassifiable for the entire state. After carefully considering Idaho's recommendation and all available information, we intend to designate the entire state as unclassifiable/attainment. There are no areas in Idaho required to be characterized by modeling or monitoring, and the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. Enclosure 1 to this letter provides the information that supports the intended designation decision for Idaho.[2]

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[1] *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

[2] Enclosure 1 is Chapter 2 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in Idaho. The Technical Support Document is also available at *https://www.epa.gov/sulfur-dioxide-designations*.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. Upon the completion of this designation action, there will be no remaining areas in Idaho to be designated.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO_2 NAAQS. For additional information regarding designations under the SO_2 NAAQS, please visit our website at *https://www.epa.gov/sulfur-dioxide-designations*. Should you have any questions, please do not hesitate to call me or have your staff contact John Chi, Office of Air and Waste, at (206) 553-1185 or chi.john@epa.gov.

Sincerely,

Michelle L. Pirzadeh
Acting Regional Administrator

Enclosure

cc: Mr. John Tippets
Director, Idaho Department of Environmental Quality

Ms. Tiffany Floyd
Air Quality Division Administrator, Idaho Department of Environmental Quality