

US EPA ARCHIVE DOCUMENT



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Mahbubul



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

March 9, 2009

Michelle Pirzadeh,
Acting Regional Administrator
USEPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Dear Ms. Pirzadeh:

On behalf of the Governor of the State 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 eight-hour ozone National Ambient Air Quality Standard (NAAQS).

Section 107(d)(1) of the Clean Air Act defines an area as nonattainment if it is violating the NAAQS or contributing to a violation in a nearby area. Core Based Statistical Area (CBSA) or Combined Statistical Areas (which includes two or more CBSA's) 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.

Three complete calendar years of Federal Reference Method (FRM) ozone data have been evaluated for three monitors in the state of Idaho (Table 1). Per CFR requirements, DEQ operates two monitors in the Treasure Valley (Boise City-Nampa metropolitan statistical area (MSA)) and one monitor in the Coeur d'Alene MSA in north Idaho.

Idaho's ozone monitoring network is designed to assess population exposure to the highest expected ambient concentrations in populated areas. Data collected from these monitors indicate attainment of the eight-hour ozone NAAQS; therefore, Idaho is recommending attainment/unclassifiable designations for these areas:

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- Boise City-Nampa MSA, including:
 - Ada County
 - Boise County
 - Canyon County
 - Gem County
 - Owyhee County

- Coeur d'Alene, ID Metropolitan Statistical Area:
 - Kootenai County

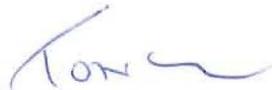
The rest of the state should be designated as attainment/unclassifiable for the eight-hour ozone NAAQS since no monitoring is taking place.

2008 monitoring data has not been certified and is not final. DEQ is working with Region 10 to address certain "missing days" for its Whitney Elementary School monitor in Boise. DEQ is confident that this monitor will meet all Appendix P data completeness requirements once the demonstration is made to Region 10 and concurrence is accepted. The missing days will then be appropriately coded in AQS, and DEQ will complete the data certification process. A similar situation exists for the Lancaster monitor in north Idaho. In both cases, the three-year aggregate data completeness falls one percentage point short of the required ninety percent. All data must be certified by July 1, 2009.

In the future, should it be necessary to redesignate an area as "nonattainment," we intend to evaluate the appropriate EPA guidance and any other relevant considerations to determine presumptive boundaries for that area, rather than default to CBSA or county boundaries.

If EPA has any further questions or concerns, please coordinate through Martin Bauer, DEQ, Air Quality Division Administrator (208/ 373-0552).

Sincerely,



Toni Hardesty
Director

c: Governor Butch Otter
Bonnie Butler, Office of the Governor
Martin Bauer, DEQ
Bruce Louks, DEQ

Table 1. 2006- 2008 Ozone Monitoring Summary, Idaho Department of Environmental Quality

Year	Site	Airs ID	1st max 8-hour ave ppm	2nd max 8-hour ave ppm	3rd max 8-hour ave ppm	4th max 8-hour ave ppm	Data Completeness %
2008	Lancaster Rd - Hayden	160550003	0.061	0.06	0.059	0.059	93
2007	Lancaster Rd - Hayden	160550003	0.072	0.071	0.071	0.067	95
2006	Lancaster Rd - Hayden	160550003	0.075	0.068	0.068	0.068	78
3-yr design value						0.064	
3-yr average data completeness							89
2008	ITD - Boise	160010019	0.079	0.075	0.072	0.072	80
2007	ITD - Boise	160010019	0.082	0.081	0.080	0.080	58
2006	ITD - Boise	160010019	0.078	0.076	0.074	0.074	84
3-yr design value						0.075	
3-yr average data completeness							74
2008	Whitney - Boise	160010030	0.077	0.074	0.072	0.069	92
2007	Whitney - Boise	160010030	0.086	0.085	0.078	0.076	84
2006	Whitney - Boise	160010030	0.09	0.088	0.083	0.082	88
3-yr design value						0.075	
3-yr average data completeness							89