



United States Department of the Interior



FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:

FWS/ANWS-AR-AQ

July 23, 2010

Mr. Martin Bauer
Administrator, Air Quality Division
Idaho Department of Environment Quality
1410 North Hilton
Boise, Idaho 83706

Dear Mr. Bauer:

On June 3, 2010, we received Idaho's draft regional haze implementation plan for review. We appreciate the opportunity to work closely with the State through the development and review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas.

This letter acknowledges that the U.S. Department of the Interior, National Park Service and U.S. Fish and Wildlife Service have received and conducted a substantive review of the Idaho draft Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

As outlined in a letter to each State dated August 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Management agencies, and we have enclosed comments associated with these priorities.

We look forward to your response, as per section 40 CFR 51.308(i)(3). For further information regarding our comments, please contact Pat Brewer, National Park Service, at (303) 969-2153, or Tim Allen, Fish and Wildlife Service, (303) 914-3802.



Mr. Martin Bauer

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Again, we appreciate the opportunity to work closely with the State and compliment you on your hard work and dedication to improving visibility in our Class I national parks and wilderness areas.

Sincerely,



Christine L. Shaver
Chief, Air Resources Division
National Park Service

Sincerely,



Sandra V. Silva
Chief, Branch of Air Quality
U.S. Fish & Wildlife Service

Enclosure

cc:

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Mr. Martin Bauer

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**Comments of the National Park Service and US Fish and Wildlife Service
Regarding the Idaho Regional Haze State Implementation Plan
July 23, 2010**

On June 3, 2010, the State of Idaho submitted a draft Regional Haze Rule State implementation plan (SIP), pursuant to the requirements codified in federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, National Park Service (NPS) and U.S. Fish and Wildlife Service (FWS). The NPS Air Resources Division staff and FWS Branch of Air Quality staff have conducted a substantive review of the Idaho draft plan, and provide the comments listed below.

We look forward to your response as per section 40 CFR 51.308(i)(3), and would be willing to work with Idaho Department of Environmental Quality (Idaho DEQ) staff towards resolving the major issues discussed below. For further information, please contact Pat Brewer, National Park Service, at (303) 969-2153, or Tim Allen, Fish and Wildlife Service, (303) 914-3802.

General Comments

The State identifies the baseline emission inventory (referred to as “02b”) and the future emission inventory (referred to as “18d”) however, a summary of the inventory development and implementation is not provided. Discussion of the modeling system is also absent from Idaho’s draft Regional Haze SIP. The State, working with the Western Regional Air Partnership (WRAP), utilized originally developed inventories, meteorology, and non guideline models in fulfilling many of the requirements of the Regional Haze Rule. Therefore, a robust discussion of these technical products, performance evaluations, and applicability to the Haze Rule is required.

The emissions impacting individual Class I areas within Idaho appear to be distinctly different between several of these areas. Idaho should clearly explain these differences and maintain these distinctions in its discussion of meeting its regional haze goals.

Specific Comments

Chapter 3. Introduction to Idaho Class I Areas

While Figure 3-1 accurately depicts the Class I areas within Idaho’s state boundaries, it does not adequately depict all Class I areas potentially impacted by air pollution sources located within the State. For example, Red Rocks Lakes Wilderness located on the border of Idaho and Montana, and Grand Teton National Park just east of the state boundary in Wyoming are not included on this map. This could potentially mislead the reader to think that the figure is inclusive of all impacted Class I areas. Please include all Class I areas both within Idaho and nearby outside the State, within the domain represented on the map, so that the reader has a sense of the full list of impacted areas.

Chapter 4. Technical Information and Data Relied Upon in This Plan

The description provided in Chapter 4 is of the original, or 'old', IMPROVE equation. Please clarify if this equation was used throughout the SIP. It is our current understanding that WRAP supported analyses and most Best Available Retrofit Technology (BART) calculations utilized the newer version of the IMPROVE equation.

Chapter 7. Pollutants Causing Visibility Impairment in Idaho Class I Areas

Figure 7-1 illustrates a distinct differences in pollutant impacts between the Class I areas. For example, impacts at Craters of the Moon National Monument and Hells Canyon Wilderness Area are clearly dominated by nitrate NO_3 . Organic Carbon (OC) dominates the baseline monitoring at the Yellowstone National Park, and the Sawtooth, and Selway Wilderness Areas. Since these areas are clearly impacted in distinct patterns, more discussion explaining these differences should be included in the SIP. The distinctions elucidated by this discussion should be maintained throughout the SIP, as it is clear that these areas should have different focus in identifying effective controls.

Chapter 8. Emission Source Inventory

The discussion of emissions growth from the baseline to 2018 indicates growth, from point and area sources, in nitrogen oxides (NO_x), volatile organic compounds (VOC), OC, elemental carbon (EC), fine and coarse particulate matter (PM fine, PM coarse), and ammonia. However, in later sections of the SIP, naturally occurring emissions from fire and inadequate time to implement additional sulfate and nitrate emission controls are explained as the reasons that Idaho cannot meet its Uniform Rate of Progress goals. Please discuss Idaho's reasons for excluding controls that could reduce these additional visibility impairing pollutants for which the inventories indicate emissions are growing.

Chapter 9. Source Apportionment

While some areas may share an IMPROVE monitoring site, impacts to Class I Areas should be discussed and evaluated individually. Impacts from neighboring states should also be discussed for each individual Class I Area. Clustering Class I Areas for source apportionment analyses is not a valid approach.

Figure 9-68 on page 131, is scaled to the entire US. Please zoom into the region around Idaho for a better illustration. Also, figures 9-7 and 9-70 appear to be mislabeled.

Please provide more discussion regarding the individual species glide slopes presented on pages 158-164. These graphs depict that the Uniform Rate of Progress goals will be met on an individual pollutant basis, however many of these pollutants are also predicted to increase.

The SIP asserts that reductions from sulfate and organic carbon are overshadowed by increases to natural fire. However, it was previously stated in Chapter 8-*Emission Source Inventory*, that

natural fire emissions estimates were held constant in the analysis. Please explain these statements in more detail.

Chapter 10. Best Available Retrofit Technology (BART) Evaluation

The BART modeling protocol, agreed to by Idaho, Washington, and Oregon, stated that the 20% best natural condition will be used for all BART analyses. The tables on pages 172-175 indicate that both 20% best natural condition and annually averaged natural condition were used for certain analyses. Please clarify if the tables are incorrectly labeled, or if Idaho varied from the agreed protocol to utilize 20% best natural condition for all BART analyses.

The BART source impact improvement is described in terms of the number of days the delta-deciview is over 0.5. While this is an accurate method to describe the frequency of visibility impacts, more information should be included to illustrate the magnitude of improvement to visibility impairment. For example, since many BART sources impact more than one Class I area, the FLMs recommend that BART determinations consider visibility improvements at multiple Class I areas.

With respect to the BART determination for the P4 Productions facility, questions remain as to the feasibility of Selective non-Catalytic Reduction Technology for the nodulizing kiln. Given the large visibility impacts of the P4 Production facility at Yellowstone and Grand Teton National Parks, as well as other Class I units, we ask that Idaho revisit this analysis. In addition, we ask that Idaho clarify what P4 Production sources are BART-eligible.

Chapter 11. Idaho Reasonable Progress Goal Demonstration

The State makes a declaration that based on “time necessary for compliance”, additional controls are unreasonable. Considering that the State has missed the 2007 deadline for submittal of its Haze SIP to EPA, it seems counterproductive to now suggest that it is unreasonable to implement controls for lack of time. Idaho should revisit this statement and reconsider the importance of the goals of the Regional Haze Rule.

There appears to be a slight math error in Table 11-2-*Idaho Statewide 2002 Point Source Sulfate Emissions*. Table 11-1-*Idaho 2002 Statewide Emissions by Pollutant and Source*, Table 11-2-*Idaho Statewide 2002 Point Source Sulfate Emissions*, and Table 11-4-*Idaho Statewide 2002 Area Source Sulfate Emissions*, should refer to SO₂ and NO_x emissions rather than sulfate and nitrate emissions. Please define the acronym RRF referred to in Table 11-12-*Summary of Idaho Class I Area Sulfate and Nitrate Visibility Improvement 20% Worst Days*.

Chapter 12. Long Term Strategy

Please explain why Red Rocks Lakes Wilderness is not presented in Table 12-12 *Idaho's Contribution of SO_x and NO_x in Surrounding Class I Areas*.

Table 12-2-*Other States' 2018 Contributions to Totals of Idaho Class I Areas and Change from 2002*, shows an increased contribution from the State of Wyoming on Craters of the Moon.

Please explain in more detail Idaho's consultation with the State of Wyoming concerning this attribution.

Please describe in more detail how Idaho's Prevention of Significant Deterioration (PSD) program benefits the State's regional haze program.

And lastly, please specify whether Idaho requires Best Management Practices and emissions tracking when implementing its Smoke Management program.