



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



N3615 (2350)

June 21, 2012

Mr. Steve Body
U. S. EPA, Region 10
Office of Air, Waste and Toxics
Suite 900, 1200 Sixth Avenue
Seattle, Washington 98101

EPA Docket ID: EPA-R10-OAR-2010-0930

Dear Mr. Body:

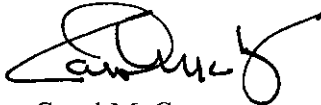
The National Park Service has reviewed the Environmental Protection Agency (EPA)'s proposed "Approval and Promulgation of Implementation Plans; State of Idaho; Regional Haze State Implementation Plan" that was published in the Federal Register on May 22, 2012. In the plan, Idaho did not consider what emission controls might be reasonable to implement for specific sources to assure "reasonable progress towards meeting the national goal of preventing any future and remedying any existing impairment of visibility in mandatory Class I federal areas." We raised this very same concern in our July 2010 comments on the draft state plan and recommended then, as we do now, that Idaho reconsider the decision that no controls are reasonable for sources under the reasonable progress prong of the Regional Haze Rule.

We agree with Idaho's approach to use the pivot tables developed by the Western Regional Air Partnership to identify major source categories for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emissions from Idaho point sources. However, Idaho did not undertake the next step and consider the need for emission controls for these sources. Idaho also did not identify a major SO₂ source, JR Simplot, that is 86 km from Craters of Moon National Monument, a Class I area managed by the National Park Service. In Table 11.2 of the final state plan, SO₂ emissions from JR Simplot comprise 1609 tons per year of the total 1905 tons per year listed as "other point sources."

In evaluating the visibility impacts from sources in Idaho, Oregon, and Washington¹, EPA determined that several of the Idaho sources have impacts between 0.3-1.3 dv. Given this finding, we urge EPA and Idaho to evaluate specific control measures for these sources.

We appreciate the opportunity to work closely with EPA Region 10 and Idaho to improve visibility in our Class I areas. For further information regarding our comments, please contact Pat Brewer at (303) 969-2153.

Sincerely,



Carol McCoy
Chief, Air Resources Division

cc:
Martin Bauer
Air Quality Division Administrator
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

¹ **Docket ID:** EPA-R10-OAR-2010-0930, 303_Support Material_Qd Memo from Keith Rose