



January 30, 2025

Dan Opalski  
Acting Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

Dear Mr. Opalski:

On behalf of the Governor of the State of Idaho, and as Director of Idaho Department of Environmental Quality (DEQ), I am submitting Idaho's recommendations for area designations related to the February 7, 2024, Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM).

The U.S. Environmental Protection Agency (EPA) strengthened the annual health-based PM<sub>2.5</sub> NAAQS by lowering the annual mean, averaged over 3-years, from 12 µg/m<sup>3</sup> to 9 µg/m<sup>3</sup>. According to the February 7, 2024, Federal Register (89 FR 16202), attainment designations should be based on the most recent complete three consecutive years of quality-assured, certified air quality data. Idaho's recommendation is based on the most recent certified data, 2021 – 2023.

On January 24, 2025, DEQ submitted demonstrations and concurrence requests for exceptional events during the 2022 and 2023 wildfire seasons. Based on concurrence, the 2021 - 2023 design values for all regulatory PM<sub>2.5</sub> monitors operated by DEQ demonstrate compliance with the 2024 PM<sub>2.5</sub> NAAQS.

Table 1 lists the three-year average design values based on certified monitoring data with the monitor values listed Attachments A and B flagged as "exceptional events" (EE) removed for Salmon, Pinehurst, and St Maries.

**Table 1. 2021-2023 PM<sub>2.5</sub> annual design values (µg/m<sup>3</sup>) with exceptional events monitor values removed.**

Site Name	County/AQS ID	Design Value
Meridian–St. Luke's	Ada/160010010	7.6
Nampa	Canyon/160270002	8.9
St. Maries	Benewah/160090010	8.9
Preston	Franklin/160410002	6.6
Salmon	Lemhi/160590004	8.9
Pinehurst	Shoshone/160790017	8.9

Idaho's recommendation of attainment for Pinehurst, Salmon, and St. Maries is based on DEQ's assessment of exceptional events for 2021, 2022, and 2023. DEQ submitted initial notification for 2021-2023 exceptional event days on March 13, 2024, and submitted demonstrations for 2022 and 2023 requesting EPA's concurrence on January 24, 2025.

While DEQ believes that the 2021 exceedance days at the Pinehurst and St. Maries monitors were likely influenced by wildfire to a degree that might otherwise trigger regulatory significance, DEQ has not submitted formal exceptional events demonstrations for such events because DEQ does not anticipate that events in 2021 will have regulatory significance as indicated in the EPA's memorandum, [Initial Area Designations for the 2024 Revised Primary Annual Fine Particle National Ambient Air Quality Standard](#), issued on February 7, 2024. In the unlikely circumstance that events in 2021 are determined to have regulatory significance for final designations decisions for the 2024 revised primary annual PM<sub>2.5</sub> NAAQS, DEQ will work with the EPA to provide additional information consistent with the requirements of the [EPA's Exceptional Events Rule](#). Further information on 2021 events can be found in the attachment "2021 Days Flagged as Exceptional Events for Wildfire Smoke Impacts."

On behalf of the Governor of the State of Idaho, Brad Little, I recommend attainment designation for Ada, Benewah, Canyon, Franklin, Lemhi, and Shoshone counties and unclassifiable designation for all remaining counties for the 2024 annual PM<sub>2.5</sub> NAAQS.

If there are any further questions, please coordinate through Michael Simon, Acting Air Quality Division Administrator at (208) 373-0212.

Sincerely,

A handwritten signature in blue ink that reads "Jess Byrne". The signature is fluid and cursive, with the first name "Jess" being more prominent than the last name "Byrne".

Jess Byrne  
Director

c: Brad Little, Governor of Idaho  
Michael Simon, Acting Air Quality Division Administrator

## Attachment A:

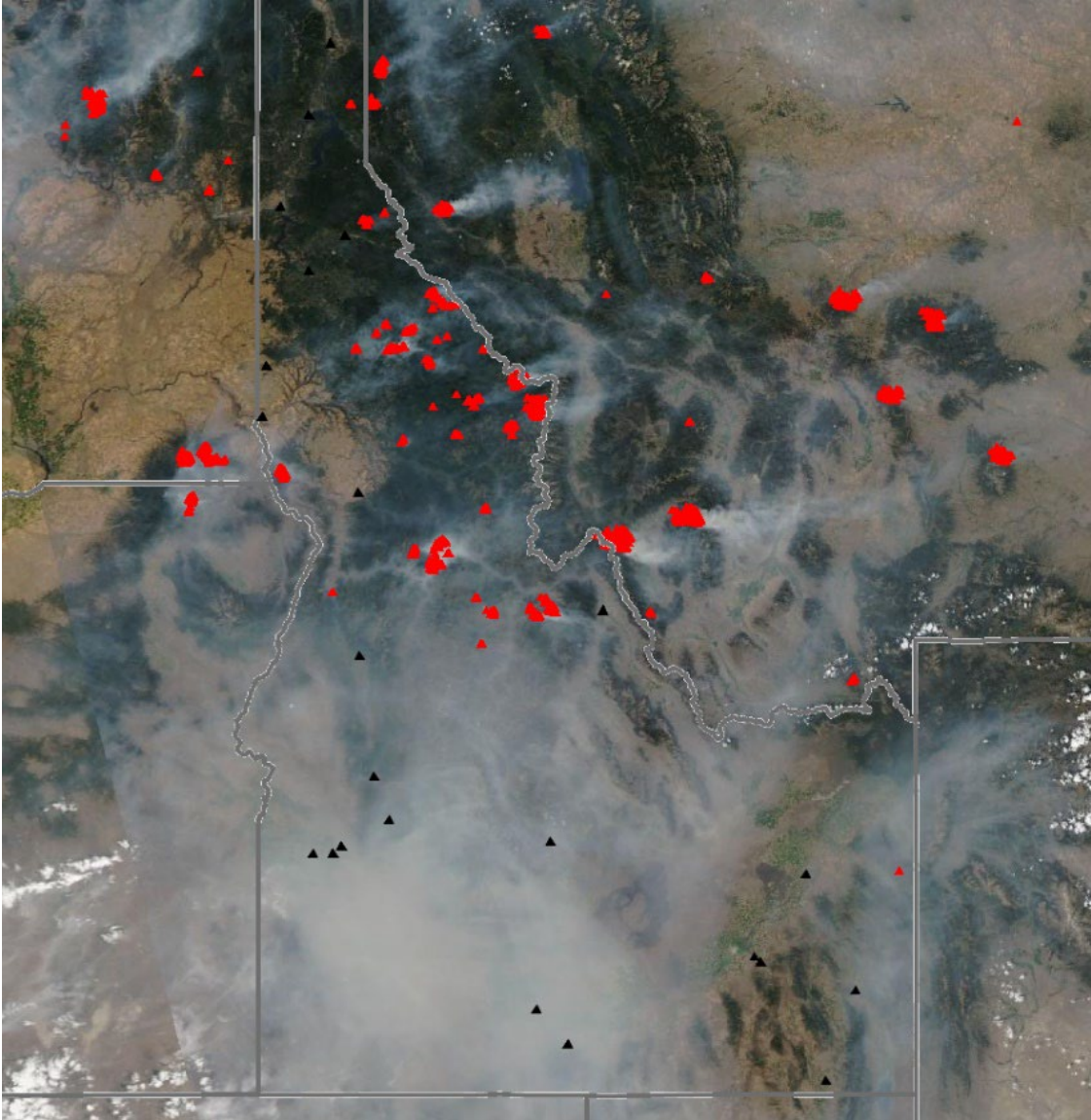
### 2021 Days Flagged as Exceptional Events for Wildfire Smoke Impacts

The days flagged for wildfire smoke (EE) impacts in 2021 in AQS are listed in Table 1 for the Pinehurst and St. Maries monitors. Figures 1-5 show smoke impacts from surrounding state and local wildfires at the Idaho monitors for several days from July to September 2021 using the AirNow Tech Navigator tool to capture satellite images from NASA's MODIS Terra. DEQ did not include satellite imagery for every day as it is not required for 2021.

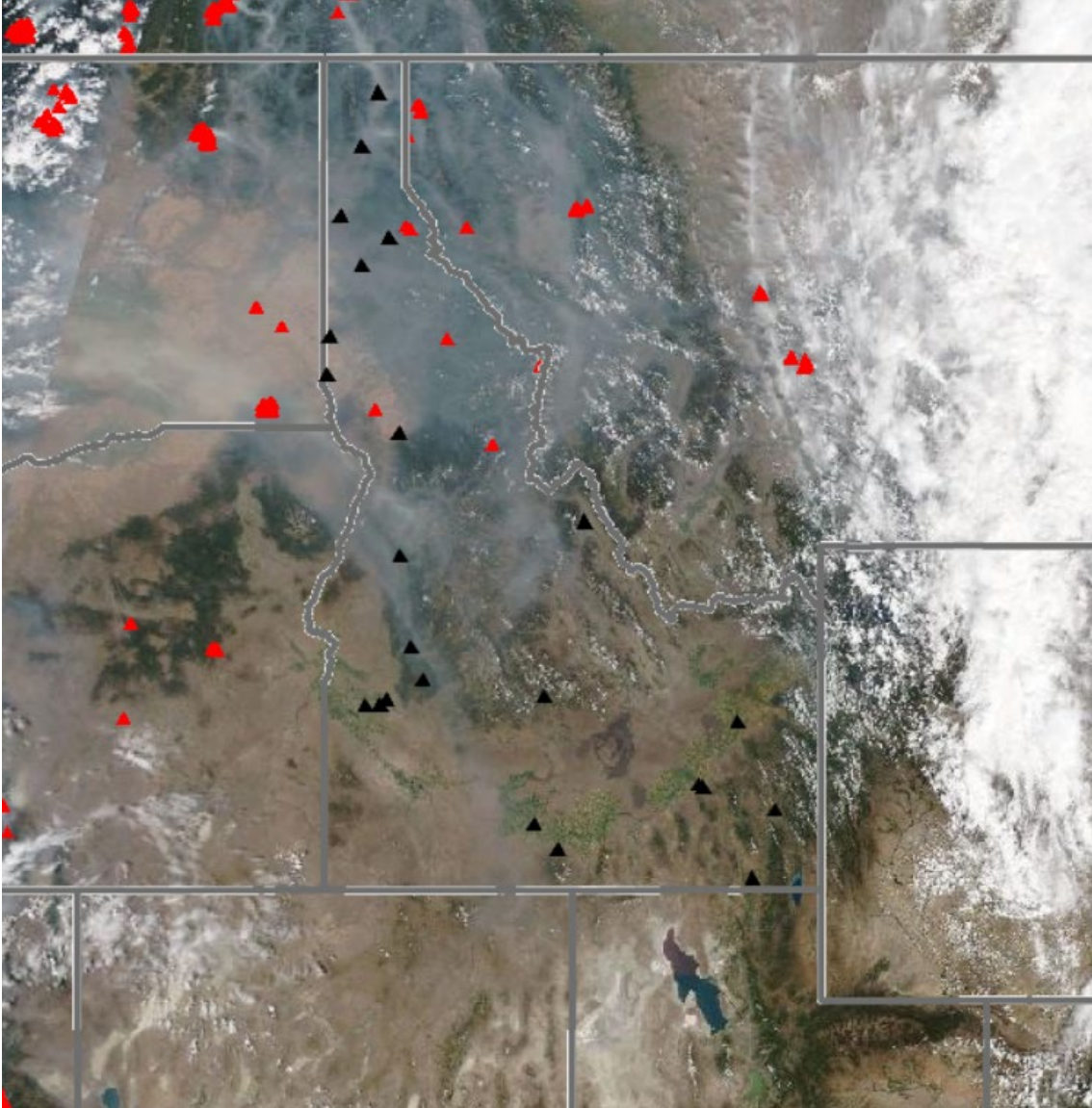
**Table 1. 2021 Days Flagged as Exceptional Events for Wildfire Smoke Impacts.**

Date	Daily Average Concentration ( $\mu\text{g}/\text{m}^3$ )	Monitor Site	Monitor ID
7/13/2021	27.6	Pinehurst	160790017
7/14/2021	41.3	Pinehurst	160790017
7/18/2021	29	Pinehurst	160790017
7/19/2021	40.4	Pinehurst	160790017
7/24/2021	23.2	Pinehurst	160790017
7/25/2021	22.2	Pinehurst	160790017
7/30/2021	33.2	Pinehurst	160790017
7/31/2021	41.2	Pinehurst	160790017
8/1/2021	42.1	Pinehurst	160790017
8/2/2021	69.6	Pinehurst	160790017
8/3/2021	65.1	Pinehurst	160790017
8/4/2021	45.5	Pinehurst	160790017
8/5/2021	57.8	Pinehurst	160790017
8/6/2021	29.3	Pinehurst	160790017
8/12/2021	81.1	Pinehurst	160790017
8/13/2021	91.1	Pinehurst	160790017
8/14/2021	86	Pinehurst	160790017
8/15/2021	42.4	Pinehurst	160790017
8/17/2021	37	Pinehurst	160790017
9/8/2021	28.9	Pinehurst	160790017
9/9/2021	33.8	Pinehurst	160790017
9/10/2021	38.8	Pinehurst	160790017
9/5/2021	22.2	Pinehurst	160790017
7/19/2021	35.2	St. Maries	160090010
7/30/2021	44.4	St. Maries	160090010
7/31/2021	55.1	St. Maries	160090010
8/1/2021	49	St. Maries	160090010
8/2/2021	66.7	St. Maries	160090010

8/3/2021	63.9	St. Maries	160090010
8/4/2021	36.4	St. Maries	160090010
8/12/2021	86.7	St. Maries	160090010
8/13/2021	112.3	St. Maries	160090010
8/14/2021	81.2	St. Maries	160090010
8/15/2021	46.1	St. Maries	160090010
9/9/2021	37.8	St. Maries	160090010
9/10/2021	34.8	St. Maries	160090010



**Figure 1. July 25, 2021- MODIS Terra satellite image overlaid with HMS hot spots (red triangles) and 24-hour PM2.5 observed at active Idaho monitors (black triangles).**



**Figure 2. August 3, 2021- MODIS Terra satellite image overlaid with HMS hot spots (red triangles) and 24-hour PM2.5 observed at active Idaho monitors (black triangles).**



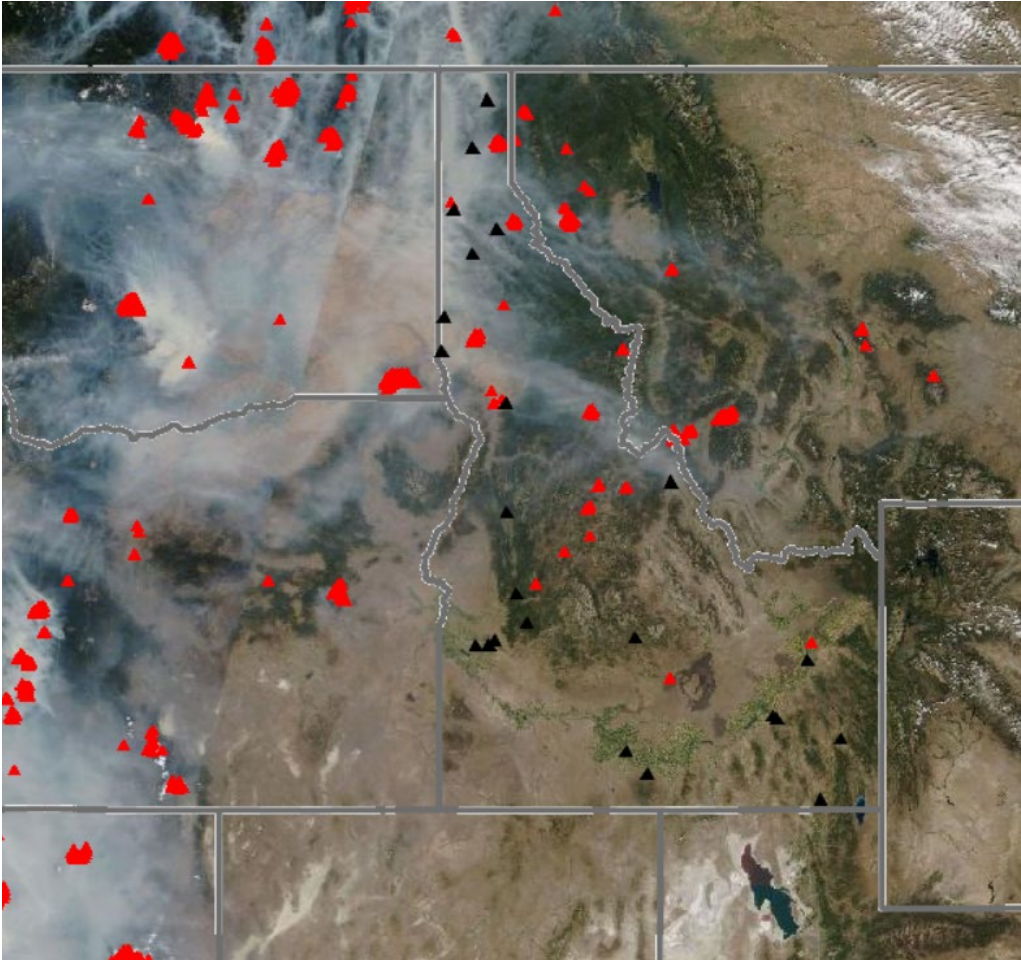


Figure 3. August 12, 2021- MODIS Terra satellite image overlaid with HMS hot spots (red triangles) and 24-hour PM2.5 observed at active Idaho monitors (black triangles).

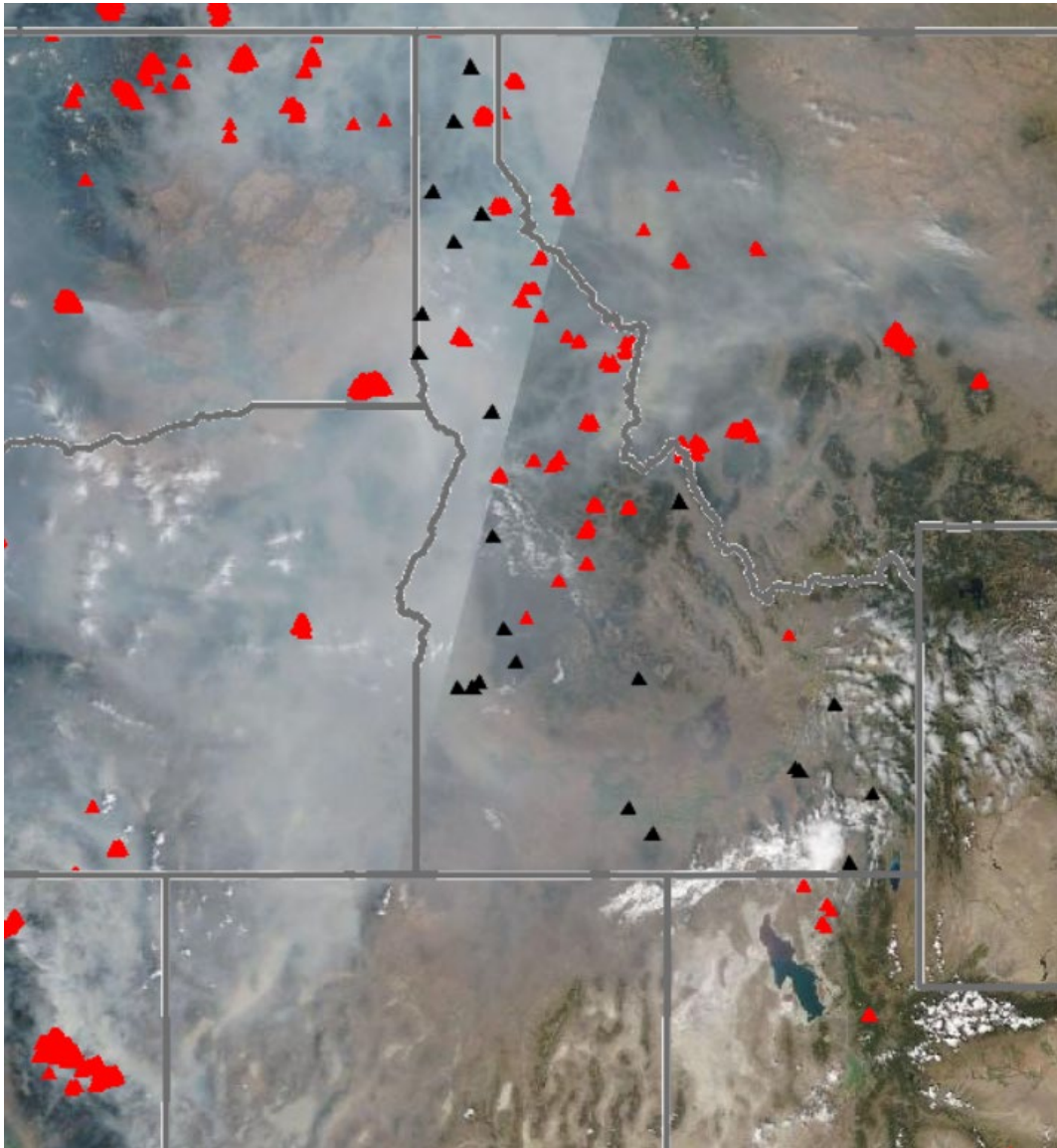


Figure 4 August 15, 2021 - MODIS Terra satellite image overlaid with HMS hot spots (red triangles) and 24-hour PM2.5 observed at active Idaho monitors (black triangles).



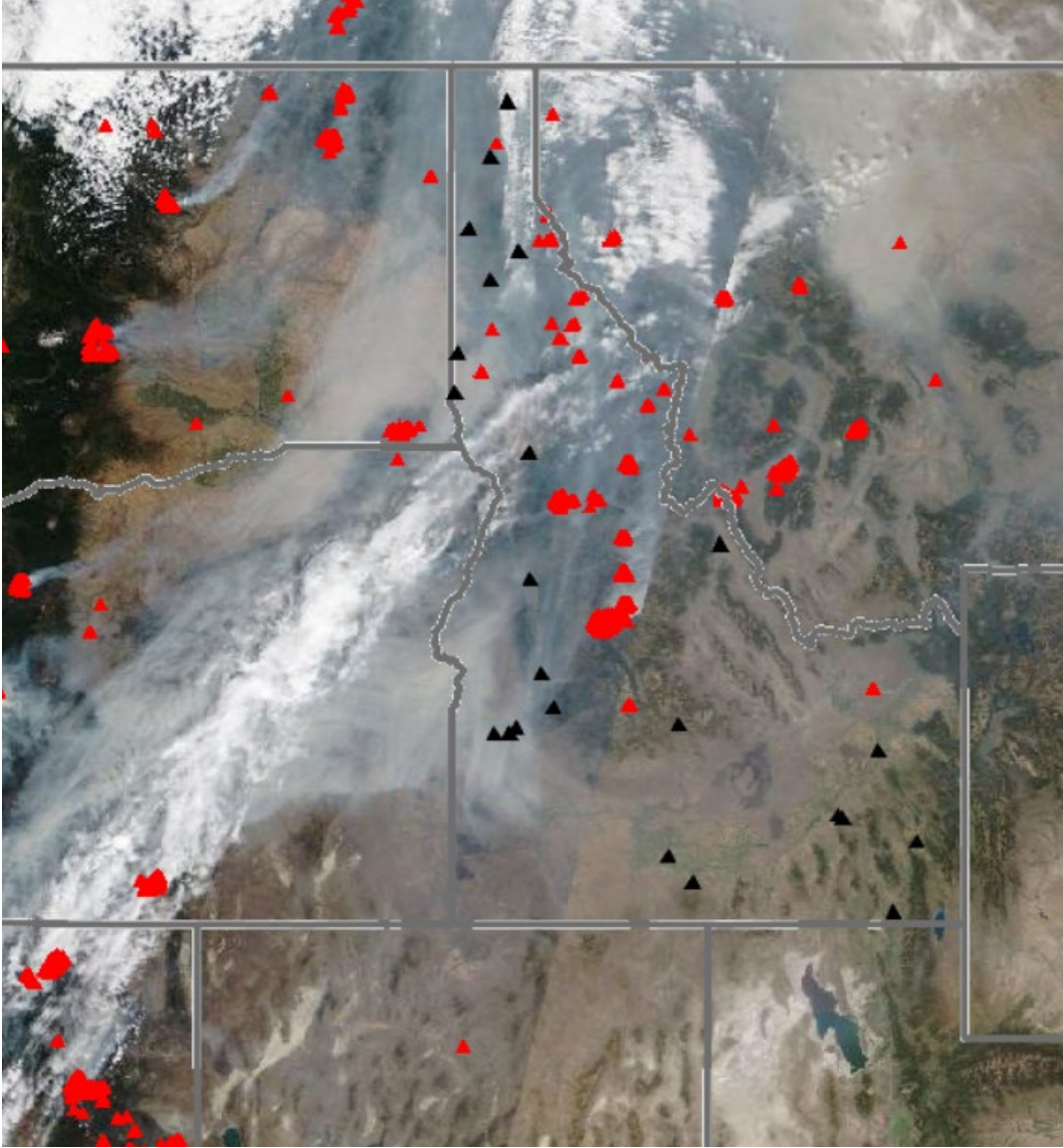


Figure 5. September 8, 2021 - MODIS Terra satellite image overlaid with HMS hot spots (red triangles) and 24-hour PM2.5 observed at active Idaho monitors (black triangles).

## Attachment B

### 2022 and 2023 Monitor Values Submitted for Concurrence as Exceptional Events for Wildfire Smoke Impacts

Tables 1 and 2 list the dates and monitor values that DEQ has submitted demonstrations and concurrence request for the 2022 and 2023 wildfire seasons respectively.

**Table 1. 2022 Monitor values for which DEQ has submitted for EPA concurrence.**

Date	Daily Average Concentration	Monitor Site	Monitor ID
7/19/2022	46.3	Salmon	160590004
7/20/2022	40.8	Salmon	160590004
7/21/2022	41.5	Salmon	160590004
7/23/2022	99.0	Salmon	160590004
7/24/2022	44.1	Salmon	160590004
7/25/2022	42.1	Salmon	160590004
7/26/2022	38.5	Salmon	160590004
7/27/2022	36.0	Salmon	160590004
7/31/2022	40.5	Salmon	160590004
8/1/2022	37.1	Salmon	160590004
8/2/2022	60.2	Salmon	160590004
8/5/2022	52.6	Salmon	160590004
8/8/2022	34.6	Salmon	160590004
8/9/2022	31.8	Salmon	160590004
8/16/2022	45.0	Salmon	160590004
8/17/2022	42.8	Salmon	160590004
8/18/2022	35.8	Salmon	160590004
9/1/2022	33.6	Salmon	160590004
9/2/2022	34.5	Salmon	160590004
9/3/2022	35.9	Salmon	160590004
9/4/2022	71.7	Salmon	160590004
9/5/2022	68.0	Salmon	160590004
9/6/2022	58.5	Salmon	160590004
9/7/2022	90.7	Salmon	160590004
9/8/2022	123	Salmon	160590004
9/9/2022	75.7	Salmon	160590004
9/10/2022	32.0	Salmon	160590004
9/11/2022	40.3	Salmon	160590004
9/12/2022	109.3	Salmon	160590004
9/13/2022	116.5	Salmon	160590004
9/14/2022	70.0	Salmon	160590004
9/10/2022	39.5	St. Maries	160090010
9/11/2022	82.1	St. Maries	160090010

<b>Date</b>	<b>Daily Average Concentration</b>	<b>Monitor Site</b>	<b>Monitor ID</b>
9/12/2022	87.3	St. Maries	160090010
9/13/2022	73.3	St. Maries	160090010
9/14/2022	39.5	St. Maries	160090010
8/19/2022	13.6	Pinehurst	160790017
8/20/2022	14.8	Pinehurst	160790017
9/1/2022	14.0	Pinehurst	160790017
9/2/2022	17.1	Pinehurst	160790017
9/3/2022	25.1	Pinehurst	160790017
9/4/2022	14.4	Pinehurst	160790017
9/8/2022	13.0	Pinehurst	160790017
9/9/2022	21.6	Pinehurst	160790017
9/10/2022	18.8	Pinehurst	160790017
9/11/2022	65.0	Pinehurst	160790017
9/12/2022	84.6	Pinehurst	160790017
9/13/2022	70.3	Pinehurst	160790017
9/14/2022	35.8	Pinehurst	160790017
9/15/2022	18.5	Pinehurst	160790017
9/16/2022	12.4	Pinehurst	160790017
9/28/2022	15.4	Pinehurst	160790017

**Table 2. 2023 Monitor values for which DEQ has submitted for EPA concurrence.**

<b>Date</b>	<b>Daily Average Concentration</b>	<b>Monitor Site</b>	<b>Monitor ID</b>
5/17/2023	18.6	Pinehurst	160790017
5/18/2023	21.8	Pinehurst	160790017
5/19/2023	22.5	Pinehurst	160790017
5/20/2023	16.0	Pinehurst	160790017
6/16/2023	17.1	Pinehurst	160790017
8/16/2023	21.5	Pinehurst	160790017
8/17/2023	23.3	Pinehurst	160790017
8/19/2023	58.2	Pinehurst	160790017
8/20/2023	63.0	Pinehurst	160790017
8/21/2023	18.5	Pinehurst	160790017
8/22/2023	29.9	Pinehurst	160790017
8/23/2023	22.7	Pinehurst	160790017
8/24/2023	16.5	Pinehurst	160790017
8/25/2023	18.7	Pinehurst	160790017
8/26/2023	15.0	Pinehurst	160790017
8/27/2023	14.3	Pinehurst	160790017
8/29/2023	12.3	Pinehurst	160790017
5/18/2023	24.5	St. Maries	160090010

<b>Date</b>	<b>Daily Average Concentration</b>	<b>Monitor Site</b>	<b>Monitor ID</b>
5/19/2023	21.9	St. Maries	160090010
8/17/2023	28.4	St. Maries	160090010
8/19/2023	55.0	St. Maries	160090010
8/20/2023	69.9	St. Maries	160090010
8/22/2023	32.0	St. Maries	160090010