



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

JUL 10 2014

OFFICE OF THE  
REGIONAL ADMINISTRATOR

Mr. Nolan Hirai  
Manager, Clean Air Branch  
State of Hawaii  
Department of Health  
P.O. Box 3378  
Honolulu, Hawaii 96801

Dear Mr. Hirai:

This letter responds to Hawaii Department of Health's (HDOH) December 11, 2013 and July 1, 2014 submittals regarding exceedances of the 2012 annual PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) that occurred at the Kona monitoring station (AQS ID: 15-001-1012) in 2011 – 2013. Specifically, these documents address 2 days in 2011, 200 days in 2012, and 66 days in 2013 as listed in Table A-1 of the enclosed document *EPA Review of HDOH's "Documentation for Natural Events Excluded Data, Kona Air Monitoring Station" Regarding Exceedances of Annual PM<sub>2.5</sub> NAAQS in 2011-2013*.

HDOH's submittals included documentation that these exceedances were caused by exceptional events due to volcanic emissions. EPA has reviewed the documentation provided by HDOH to demonstrate that the exceedances on these days meet the criteria for an exceptional event in the Exceptional Events Rule (EER). Based on the weight of evidence, EPA concurs that the exceedances were caused by volcanic exceptional events and finds that HDOH has successfully made the demonstrations referred to in 40 CFR §50.14. In addition, HDOH has met the schedule and procedural requirements in section 50.14(c) with respect to the same data. EPA's detailed assessment of HDOH's submittals is enclosed. My staff will enter "concurrence flags" for these data into EPA's AQS data system.

Based on our review of the HDOH's submittals, EPA will exclude these data from the following types of calculations and activities:

- EPA's Air Quality System (AQS) will not count these days as exceedances when generating user reports, or include them in design values estimates, unless the AQS user specifically indicates that they should be included.
- EPA will accept the exclusion of these data for the purpose of selecting appropriate background concentrations for New Source Review air quality analyses.<sup>1</sup>

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<sup>1</sup> If we are the permitting authority, we will propose permits on this basis. If we are commenting on another permitting authority's proposed action, our comments will be consistent with the concurrences in this letter.


- EPA will accept the exclusion of these data for the purpose of selecting appropriate background concentrations for transportation conformity hot spot analyses.<sup>2</sup>
- The data will continue to be publicly available, but EPA's publications and public information statements on the status of air quality in the affected area will not reflect these data in any summary statistic of potential regulatory application, unless such inclusion is specifically noted.<sup>3</sup>

In addition, EPA will rely on calculated values that exclude these data in proposed regulatory actions, such as a proposed designation, classification, or attainment demonstration related to the 2012 annual PM<sub>2.5</sub> NAAQS. These regulatory actions require EPA to provide an opportunity for public comment prior to taking a final Agency action. If EPA is pursuing one of these actions using PM<sub>2.5</sub> data from the Kona station, EPA will open a new comment period during which EPA may receive comments on the exceptional event submission you have made and the concurrences conveyed in this letter. If so, we must consider and respond to those comments before taking final regulatory action. Accordingly, the concurrences conveyed in this letter do not constitute final EPA action regarding any matter on which EPA is required to provide an opportunity for public comment. In particular, this applies to determinations regarding the attainment status or classification of the area. Final actions will take place only after EPA completes notice and comment rulemaking on those determinations. As an additional clarification, the concurrences conveyed in this letter are applicable only to determinations incorporating the submitted data relative to the 2012 annual PM<sub>2.5</sub> NAAQS.

In August 2014, EPA anticipates transmitting our intended designations for Hawaii for the 2012 annual PM<sub>2.5</sub> NAAQS to Governor Abercrombie. We will also publish the intended designations in the Federal Register and accept public comments. Our intended designations for Hawaii will take into consideration today's concurrences regarding exceedances of the 2012 annual PM<sub>2.5</sub> NAAQS that occurred in 2011 - 2013.

If you have any questions or wish to discuss this matter further, please contact Deborah Jordan, Director of the Air Division at (415) 947-8715.

Sincerely,

  
for Jared Blumenfeld 10 July 2014

Enclosure

cc: Lisa Young, HDOH

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<sup>2</sup> Applicable only to PM<sub>10</sub> and PM<sub>2.5</sub>.

<sup>3</sup> These data may be included in statistics intended to describe trends in actual air quality in the area.