



REGION 9

SAN FRANCISCO, CA 94105

July 26, 2024

Marianne Rossio, P.E.
Manager, Clean Air Branch
Hawaii Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Manager Rossio:

This letter provides the U.S. Environmental Protection Agency's (EPA) review and approval of the State of Hawaii Department of Health's (HDOH) request for discontinuation of the sulfur dioxide (SO₂) State/Local Air Monitoring Station (SLAMS) monitor at the Kahe site (Air Quality System (AQS) Site ID: 15-003-4001). A request for EPA approval of this network change was submitted to EPA on April 30, 2024. Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors.

The Kahe SO₂ SLAMS monitor was installed in 2017 for the purpose of satisfying the 2015 SO₂ Data Requirements Rule (DRR) (40 CFR Part 51 Subpart BB) for Hawaiian Electric Company's (HECO) Kahe Generating Station, the Kalealoa Cogeneration Plant, and AES Hawaii, Inc.'s Cogeneration Plant on Oahu. According to 40 CFR 51.1205(a)(3), "[f]or any area where SO₂ monitoring was conducted to characterize air quality pursuant to § 51.1203, the air agency shall continue to operate the monitor(s) used to meet those requirements and shall continue to report ambient data pursuant to existing ambient monitoring regulations, unless the monitor(s) have been approved for shut down by the EPA Regional Administrator pursuant to §51.1203(c)(3) or pursuant to 40 CFR 58.14."

The Kahe SO₂ SLAMS monitor did not meet the requirements for closure in §51.1203(c)(3). Therefore, discontinuation of the Kahe SO₂ SLAMS monitor was reviewed by EPA against criteria contained in 40 CFR 58.14(c)(1). According to certified data submitted to EPA's AQS, the Kahe SO₂ monitor has shown attainment of the 2010 SO₂ National Ambient Air Quality Standards (NAAQS) based on the five most recent design values (design values 2019-2023, encompassing data years 2017 through 2023). EPA has determined that, based on the design values from 2019-2023, there is a less than 10 percent chance of exceeding 80 percent of the 2010 SO₂ NAAQS at this site. The Kahe SO₂ monitor is not specifically required by an attainment or maintenance plan and is not located in a nonattainment or maintenance area. This monitor is not needed to fulfill 40 CFR Part 58 Appendix D SO₂ minimum monitoring requirements. Therefore, the closure of the Kahe SO₂ monitor will not prevent HDOH from meeting 40 CFR Part 58 Appendix D requirements.

Based on these analyses, EPA approves HDOH's request for discontinuation of the Kahe SO₂ SLAMS monitor pursuant to 40 CFR 58.14(c)(1). Please include this letter and the relevant monitor and site information in the next HDOH annual monitoring network plan.

If there are any questions regarding this letter, please feel free to contact me at (415) 972-3134 or Julia Carlstad at (415) 947-4107.

Sincerely,

Dena Vallano, Manager
Monitoring and Analysis Section

cc: Rana K Balanay, HDOH
Lisa Wallace, HDOH
Lisa Young, HDOH
Gary Wu, HDOH