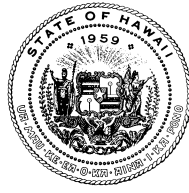


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'AINA O KA MOKU'AINA 'O HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

In reply, please refer to:
File:

25-354E CAB

October 10, 2025

Mr. Michael Martucci
Acting Regional Administrator
U.S. Environmental Protection Agency
Region IX (Mail Code ORA-1)
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Martucci:

SUBJECT: Hawai'i Infrastructure State Implementation Plan (SIP) Revision for the 2010 Sulfur Dioxide (SO₂), 2012 Fine Particulate Matter (PM_{2.5}) and 2015 Ozone (O₃) National Ambient Air Quality Standards (NAAQS).

The Hawai'i State Department of Health (HDOH) is pleased to submit Hawai'i's SIP revision for purposes of meeting the "infrastructure" requirements under Sections 110(a)(1) and 110(a)(2) of the Clean Air Act (CAA) for the 2010 SO₂, 2012 PM_{2.5}, and 2015 O₃ NAAQS.

The submittal includes both the infrastructure SIP revision as well as new and revised rules for adoption into the SIP. The submittal also includes CAA Section 110(a)(2) Elements that sets forth how these updated and new provisions, together with the existing provisions of Hawai'i's SIP, fulfill the requirements of CAA Sections 110(a)(1) and 110(a)(2).

For CAA Section 110(a)(2)(G), referred to as Element G, an SO₂ concentration measured on the Island of Hawai'i in 2021 characterized Hawai'i County as a Priority II region. Pursuant to 40 Code of Federal Regulations (CFR) §51.150, Priority I, IA, or II areas are required to have SIP-approved emergency episode contingency plans. In accordance with 40 CFR §51.152(d)(1), the U.S. Environmental Protection Agency (EPA) may exempt those portions of Priority I, IA, or II regions which have been designated attainment or unclassifiable/attainment for the specific NAAQS. Based on 40 CFR §51.152(d)(1) and Hawai'i County's designation as unclassifiable/attainment for SO₂, we are requesting an exemption from the contingency plan requirements of CAA §110(a)(2)(G). While Hawai'i's most recent three years of data (2022 – 2024) now classifies Hawai'i County as a Priority III region that is not required to develop an emergency episode contingency plan, we maintain our request for an exemption due to the varying volcanic activity on Hawai'i island. Please also note that Hawai'i has an exceptional event mitigation plan for Hawai'i County to protect public health from exceedances of the SO₂ and PM_{2.5} NAAQS due to volcanic eruptions.

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While HDOH currently notifies the public of any exceedance of a NAAQS through the public facing Clean Air Branch website, to further address CAA Section 110(a)(2)(J), referred to as Element J, the Hawai'i Administrative Rules (HAR) will be amended to incorporate a provision for the HDOH to regularly notify the public of instances or areas in which a new or revised NAAQS was exceeded, advise the public of health hazards associated with such exceedances, and enhance public awareness of measures to prevent such exceedances and of ways in which the public can participate in regulatory or other efforts to improve air quality.

HDOH provided a 30-day public comment period and opportunity for public hearing concerning this submittal. Please refer to Attachment 4 for Public Participation Process Documentation, which includes dates regarding the public participation process and HDOH's responses to comments.

The submittal of Hawai'i's Infrastructure SIP is being provided electronically via EPA's State Planning Electronic Collaboration System (SPeCS). The SIP submittal will also be posted on the Clean Air Branch website at: <https://health.hawaii.gov/cab/infrastructure-state-implementation-plans-i-sips/>.

HDOH appreciates the guidance provided by EPA for developing the plan and looks forward to your review and approval of Hawai'i's infrastructure SIP revision. If you have any questions, please do not hesitate to contact Ms. Marianne Rossio of the Clean Air Branch at (808) 586-4200.

Sincerely,

Kenneth Fink

KENNETH S. FINK, MD, MGA, MPH
Director of Health

MM:rkb

- c: Michelle Angelich, Acting Division Director, Air and Radiation Division, U.S. EPA, Region IX
Anita Lee, Ph.D., Assistant Director, Air and Radiation Division, U.S. EPA, Region IX
Rynda Kay, Ph.D., Acting Manager, Geographic Strategies and Modeling Section, U.S. EPA, Region IX
Tom Kelly, Geographic Strategies and Modeling Section, U.S. EPA, Region IX