COLORADO
Department of Public Health & Environment

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June 4, 2018

Doug Benevento
Regional Administrator
USEPA Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Submittal of Exceptional Events Demonstration and Request to Extend 2008 Ozone National Ambient Air Quality Standard Attainment Deadline for the Denver Metropolitan/North Front Range Nonattainment Area

Dear Mr. Benevento:

Pursuant to the provisions of Sections 172(a)(2)(C) and 181(a)(5) of the Clean Air Act (CAA), the State of Colorado requests that United States Environmental Protection Agency (EPA) extend the attainment deadline for the nine-county Denver Metropolitan/North Front Range (DMNFR) nonattainment area for purposes of the 2008 eight-hour ground-level ozone National Ambient Air Quality Standard (NAAQS). On May 4, 2016, the EPA published a final rule (81 Fed. Reg. 26697) that determined this area failed to attain the 2008 eight-hour ozone NAAQS by the applicable marginal area attainment deadline and reclassified the DMNFR as a moderate area with an attainment deadline of July 20, 2018. While the area's design value for 2015-2017 exceeds 0.075 parts per million (ppm), the DMNFR is eligible for an extension because the area has clean data for the 2017 attainment year after excluding exceptional events and the State has complied with all requirements and commitments in its implementation plan.

Under 40 C.F.R. § 51.1107, areas have clean data if the fourth-highest daily maximum 8-hour ozone concentration does not exceed 0.075 ppm. The Colorado Department of Public Health and Environment, Air Pollution Control Division ("Division"), has certified that the 2017 ozone concentration data and quality assurance data for the DMNFR are completely submitted to the EPA's Air Quality System and that the ambient data are accurate when the quality assurance findings are taken into consideration. The submitted data demonstrates that the DMNFR achieved a clean data year in 2017 after the exclusion of data for two days that were influenced by exceptional events. The table below shows the fourth maximum 8-hour ozone concentration observed in 2017 at each monitor in the DMNFR.

| Monitoring Site | AQS ID | County | 2017 4th Highest Concentration **Including** Exceptional Events (ppm) | 2017 4th Highest Concentration **Excluding** Exceptional Events (ppm) * |
|---|---|---|---|---|
| Welby | 08-001-3001 | Adams | 0.068 | --- |
| Highland | 08-005-0002 | Arapahoe | 0.072 | 0.072 |
| Aurora East | 08-005-0006 | Arapahoe | 0.069 | --- |
| Boulder Reservoir | 08-013-0014 | Boulder | 0.073 | --- |
| CAMP | 08-031-0002 | Denver | 0.067 | --- |
| La Casa | 08-031-0026 | Denver | 0.068 | --- |
| Chatfield State Park | 08-035-0004 | Douglas | 0.074 | 0.074 |
| Welch | 08-059-0005 | Jefferson | 0.075 | 0.072 |
| Rocky Flats - N | 08-059-0006 | Jefferson | 0.075 | 0.075 |
| NREL | 08-059-0011 | Jefferson | 0.076 | 0.074 |
| Aspen Park | 08-059-0013 | Jefferson | 0.068 | 0.066 |
| NPS - Rocky Mtn. NP | 08-069-0007 | Larimer | 0.067 | --- |
| Fort Collins - West | 08-069-0011 | Larimer | 0.075 | --- |
| Fort Collins - CSU | 08-069-1004 | Larimer | 0.066 | --- |
| Greeley - Weld Tower | 08-123-0009 | Weld | 0.072 | --- |

* Only sites for which data are being requested for exclusion are shown

EPA promulgated the Exceptional Events Rule (EER) on March 22, 2007 (72 Fed. Reg. 13560) pursuant to the 2005 amendment of CAA Section 319(b). EPA revised the EER in 2016 (81 Fed. Reg. 68216). The EER allows for the exclusion of air quality monitoring data influenced by exceptional events from use in determinations of exceedances or violations of the NAAQS, provided that federal, state, or local government agencies submit certain technical demonstrations and follow procedural requirements. Following the EER criteria, on April 6, 2018, the Division published for public comment an exceptional event demonstration for wildfire-influenced ozone data recorded on September 2 and 4, 2017. The Division accepted public comments until May 16, 2018 (extended from May 9, 2018), compiled responses, and is submitting the final exceptional events demonstration simultaneously with this letter. The demonstration requests exclusion of the monitoring data for a total of six sites on two days as shown below:

| Site Name<br>AQS ID | Aspen Park<br>080590013 | Chatfield<br>080350004 | Highland<br>080050002 | NREL<br>080590011 | RFN<br>080590006 | Welch<br>080590005 |
|---|---|---|---|---|---|---|
| 9/2/2017 | --- * | 0.071 ppm | --- * | 0.076 ppm | 0.071 ppm | 0.075 ppm |
| 9/4/2017 | 0.072 ppm | 0.073 ppm | 0.071 ppm | 0.076 ppm | 0.078 ppm | 0.074 ppm |
| Affected hours to be excluded: | | | | | | |
| --- * | 9 - 17 | --- * | 8 - 20 | 10 - 19 | 8 - 18 | --- * |
| 10 - 19 | 9 - 19 | 10 - 17 | 7 - 19 | 6 - 19 | 8 - 19 | 10 - 19 |

* Not requested for event concurrence

I certify that the State of Colorado has complied with all requirements and commitments pertaining to the DMNFR in the applicable ozone state implementation plan and that the fourth-highest daily maximum 8-hour ozone concentration in the DMNFR did not exceed 0.075 ppm in 2017, after excluding certain data pursuant to the Exceptional Events Rule.

The Division respectfully requests that EPA extend the attainment deadline for the Denver Metropolitan/North Front Range 2008 ozone NAAQS moderate nonattainment area by one year to July 20, 2019. If you have any questions, please contact Chris Colclasure of my staff at (303) 692-3269.

Sincerely,

Garrison Kaufman
Director
Air Pollution Control Division
Colorado Department of Public Health and Environment

cc: Larry Wolk, MD, CDPHE
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Attachments:
"CDPHE Exceptional Event Demonstration for Ozone on September 2 and 4, 2017"
"Colorado 2017 Data Certification Request Letter"