



Alcoa Corporation
Intalco
4050 Mountain View Road
Ferndale, WA

May 17, 2024

Ms. Anya Caudill
Washington State Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98503-7600

Re: Comments on the Intalco-Ferndale Sulfur Dioxide Nonattainment Area SIP Revision

Dear Ms. Caudill,

Alcoa Corporation would like to take this opportunity to provide comments on the *Redesignation to Attainment and First 10-year Maintenance Plan for the Intalco-Ferndale Sulfur Dioxide Nonattainment Area* (Public Review Draft; dated March 2024).¹ The proposed State Implementation Plan (SIP) revision has been developed by Washington State Department of Ecology ("Ecology") and partners due to the 2020 curtailment and 2023 closure of the Intalco aluminum smelter and, as a result, sulfur dioxide (SO₂) concentrations have measured less than the 75 ppb 1-hour SO₂ National Ambient Air Quality Standard (NAAQS) in the nonattainment area. Once the public comment period is closed, we understand that Ecology will review comments and update the SO₂ SIP revision as necessary, then submit the final document to US Environmental Protection Agency (EPA). We have reviewed the redesignation request and proposed Maintenance Plan and would like to provide feedback.

Support for the Redesignation Request and Maintenance Plan

We view the redesignation request and proposed Maintenance Plan to be comprehensive and well-reasoned. As demonstrated by the proposed plan, the two ambient SO₂ monitors in the nonattainment area, Ferndale-Mountain View Road and Ferndale-Kickerville Road, show that SO₂ concentrations in the area are well below the 75 ppb 1-hour SO₂ NAAQS following Intalco's 2020 curtailment and 2023 closure. The annual 99th percentile daily maximum 1-hour SO₂ concentrations have been less than the NAAQS since 2020 for the Mountain View site and they have been less than the NAAQS for the Kickerville site since its inception to the Washington ambient air monitoring network in 2017. In 2022, design concentrations at both sites were less than 50% of the NAAQS at 22 and 23 µg/m³ for Kickerville and Mountain View, respectively. Design concentrations in 2023 decreased further to just 3 µg/m³ for both sites. The evidence of attainment of the 75 ppb 1-hour SO₂ NAAQS in the area since the Intalco curtailment and its ultimate closure is clear and provides ample support for the redesignation request as well as the proposed Maintenance Plan that would include discontinuing these monitors and implementing a robust alternative verification approach to confirm the maintenance area's attainment status.

¹ Ecology, March 2024. Washington Air Quality State Implementation Plan Revision: Redesignation to Attainment and First 10-year Maintenance Plan for the Intalco-Ferndale Sulfur Dioxide Nonattainment Area (Public Review Draft). <https://ecology.wa.gov/getattachment/be5b0615-7994-4f7c-a533-7cb347f81693/202403IntalcoSO2MaintSIP.pdf>



Requests for Clarification or Revision

Additional comments on the proposed Maintenance Plan are described below where we request minor revisions or clarification for the final Maintenance Plan.

1. In Chapter 4. *Monitoring Data*, we request the addition of the 2023 SO₂ ambient air monitoring data to Table 3, Table 4, and Figure 7 to further illustrate that attainment of the 75 ppb 1-hour SO₂ NAAQS has been achieved and support that the existing two monitoring sites, Ferndale-Mountain View Road and Ferndale-Kickerville Road, are no longer necessary.
2. In Chapter 4. *Monitoring Data*, we note that the citation of 40 CFR 58.14(c)(4) on page 25 of the proposed Maintenance Plan is likely intending to cite 40 CFR 58.14(c)(3).
3. In Chapter 6. *Verification of Attainment, Control Measures, and Maintenance Demonstration*, we request that a clarifying statement be added to indicate that that once the Ferndale-Mountain View Road and Ferndale-Kickerville Road sites are approved to be discontinued, then AO No. 13551 will be terminated and Alcoa will no longer be responsible for operating these sites in the maintenance area. Further, that any new monitoring site that may be required by the Maintenance Plan would be funded by NWCAA and/or the SO₂-emitting sources being investigated through cumulative air dispersion modeling.

Lastly, we request that Ecology, NWCAA, and EPA complete all necessary steps to approve this SIP revision redesignating the area as in attainment with the 1-hour SO₂ NAAQS, certify the monitoring data, and authorize the discontinuation of SO₂ monitoring in the area.

In closing, we appreciate the efforts of Ecology and NWCAA to develop the redesignation request and proposed Maintenance Plan. Thank you for consideration of these comments during your review process.

Sincerely,

Kristin Gaines
Director, Transformation – Western US
Alcoa Corporation