



**DEPARTMENT of ENVIRONMENT
and NATURAL RESOURCES**

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PIERRE, SOUTH DAKOTA 57501-3181

November 16, 1995

William P. Yellowtail
Regional Administrator
US EPA - Region VIII
999 18th Street - Suite 500
Denver, CO 80202-2466

Dear Mr. Yellowtail:

The Secretary of the Department of Environment and Natural Resources has been delegated by the Governor of South Dakota as his designee for the air quality program in South Dakota. In that capacity and under the authority provided in the Clean Air Act, Section 107(d)(3)(D), I am responding to your letter dated July 19, 1995, concerning the air quality designation of Rapid City.

The state's position on this matter continues to be that the Rapid City area should not be redesignated to nonattainment. There have been many positive steps taken to reduce dust levels in the Rapid City area to meet the federal dust standard. The air quality improvements that have been accomplished through these steps are substantiated by having no additional exceedances of the federal dust standard since the two samples taken in October, 1992.

Private industry, local level governments, and state governments have all contributed to improving the area's air quality. As requested in your letter, I will briefly describe the efforts taken so far.

Private industry, working with state and local government, has invested considerable time and resources to reduce dust emissions from their operations. For example, since 1993, the South Dakota Cement Plant has invested nearly \$2.5 million in installing and improving their pollution equipment. Merrilat Industries has invested over \$2.5 million since 1990 to install new equipment and initiate other measures to reduce the emissions from their plant. Hills Material has invested \$1.2 million over the past two years to upgrade and install new air pollution control equipment. Other industries in the area have invested in comparable projects. Investments like this certainly show that Rapid City's industries are committed to working towards ensuring the area meets the federal dust standard.

The City of Rapid City has done a tremendous amount of work to improve their street sanding operations to minimize dust pollution. Dust from street sanding has continually been shown to be one of the major contributors to the dust problem in Rapid City. However, due to the City's efforts, we believe the problem is now under control. For example, the City has replaced the typical street sanding material with magnesium chloride in the downtown area. While being more costly, the change has drastically reduced dust pollution as shown in the air monitoring data being

submitted along with this letter. The City has also purchased several new vacuum type street sweepers and developed a plan to remove sanding material as soon as practicable. Because of these efforts, the City was a recipient of an environmental award from the EPA in 1994. Lastly, the City is working with the state in testing a new street sanding material called "Realite Plus" that when used creates less dust than the sanding materials used in the past. This material has already been purchased and delivered for use in a special study this winter to determine whether its use will further improve the air quality of the area. We will keep your staff apprised of the results of the study.

The Pennington County Air Quality Board has devoted considerable time and effort towards improving the air quality of Rapid City and educating people on the benefits of controlling dust. This Board has adopted a local ordinance for the purpose of controlling dust pollution. This ordinance has specific requirements for controlling dust from street sanding, construction projects, paved and unpaved parking lots, as well as voluntary controls on woodburning. The Board has also produced several educational pamphlets regarding the area's air quality and is in the process of producing a video tape to educate the public on woodburning.

The state Department of Environment and Natural Resources has devoted a large amount of time and resources to improving the air quality of the area. Department staff have worked with the City, County, industry, and private citizens on several projects that have improved the air quality of the area. The department has also established a network of air samplers to monitor the air quality and has added additional stations requested by your agency.

The department has developed, and your agency has approved, the state's Title V air quality operating permit and Prevention of Significant Deterioration Programs. The department plans on using these permit programs as a mechanism to further control the dust pollution. By using these programs, we will avoid having to adopt regulations. Instead, we can develop reasonable, site-specific controls for each industry in Rapid City that they can meet and ensure clean air for the area. The department will soon be discussing the details of this part of our plan with the appropriate members of your staff.

In addition to the above information, you requested state commitments on several other items:

1. An analysis of Rapid City dust monitoring data.

I have enclosed a document that contains the department analysis of the Rapid City dust monitoring data. The document reviews the history of the network, describes our current monitoring sites, and presents an analysis of the data collected to date.

2. A commitment that the State will submit an approvable SIP revision which includes the control measures it believes have corrected the dust problem in Rapid City.

The department is currently working on revisions to the state implementation plan and is planning on submitting those changes to your agency within the deadline specified in your letter. We have scheduled a hearing in December before the Board of Minerals and Environment to consider changes to the state's air quality regulations. We will submit those changes to the EPA once we have completed the state rule-making process.

The department is also currently discussing with industry representatives possible conditions to be added to industrial air quality permits to control fugitive dust. The department's intent is to submit those permits to EPA for review. In addition, the final proposed permits will be required to go through the normal public notice process for a Title V permit. The result will be to have federally enforceable conditions in the industry's Title V Air Permit to control the fugitive dust sources.

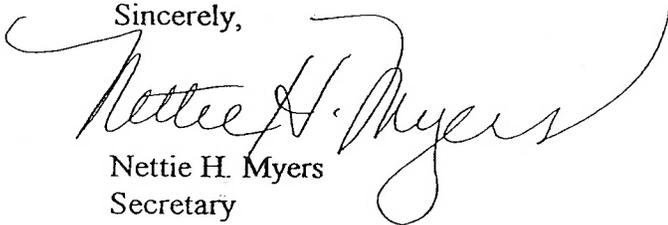
3. A commitment that the State continue to operate the dust monitoring network according to requirements in 40 CFR Part 58, including the installation of the new maximum concentration dust monitoring site.

The State remains committed to operating the current air monitoring network.

In closing, I would like to reiterate that there has been a tremendous effort put forward to correct the dust problems that have occurred in the Rapid City area. I think these efforts are reflected in the fact that the dust pollution collected on the State's monitors has decreased over the last three years. However, in order to keep the dust levels down, we all need to make sure we remain committed to maintaining the efforts that have been put forward.

Again, I do not believe that the Rapid City area should be redesignated to nonattainment and ask that the EPA stop the process to do so. We will keep you and your staff informed as we work towards meeting the other deadlines specified in your letter. Thank you for your favorable consideration to the state's request.

Sincerely,



Nettie H. Myers
Secretary

cc: Governor William J. Janklow
Dick Sweetman, Chairman, Board of Minerals & Environment
Ed McLaughlin, Mayor, City of Rapid City
Bob Haskell, Chairman, Pennington County Commission
George Dunham, Chairman, Pennington County Air Board
U.S. Senator Larry Pressler
U.S. Senator Tom Daschle
U.S. Representative Tim Johnson