



July 21, 2022

Dianne Hobbs
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Comments submitted to: Dianne.hobbs@deq.idaho.gov

Re: Conservation Organizations' Comments on Idaho Department of Environmental Quality's Draft Regional Haze State Implementation Plan for the 2nd Planning Period

Dear Ms. Hobbs:

National Parks Conservation Association and Coalition to Protect America's National Parks ("Conservation Organizations") submit the following comments and attached technical reports¹ regarding the Idaho Department of Environmental Quality's ("DEQ") Draft Regional Haze State Implementation Plan for the 2nd Planning Period ("Proposed SIP").

National Parks Conservation Association ("NPCA") is a national organization whose mission is to protect and enhance America's national parks for present and future generations. NPCA performs its work through advocacy and

¹ Vicki Stamper & Megan Williams, "OIL AND GAS SECTOR REASONABLE PROGRESS FOUR-FACTOR ANALYSIS OF CONTROLS FOR FIVE SOURCE CATEGORIES: NATURAL GAS-FIRED ENGINES, NATURAL GAS-FIRED TURBINES, DIESEL-FIRED ENGINES, NATURAL GAS-FIRED HEATERS AND BOILERS AND FLARING AND INCINERATION," (March 6, 2020) (Ex. 1) ("Stamper Expert Report March 2020"); Letter from Emily Wolf, New Mexico Program Coordinator, National Parks Conservation Association, and Erik Schlenker-Goodrich Executive Director Western Environmental Law Center, "Comments responding to 4-factor analysis submittals from identified oil & gas operators," (July 10, 2020), including enclosure, Vicki Stamper & Megan Williams, "Assessment of Cost Effectiveness Analyses for Controls Evaluated Four – Factor Analyses for Oil and Gas Facilities For the New Mexico Environment Department's Regional Haze Plan for the Second Implementation Period," (July 2, 2020) (Ex. 2) ("Stamper Expert Report July 2020"). The comment letter fully incorporates by reference these reports and includes both these expert reports as exhibits.

education, with its main office in Washington, D.C. and 24 regional and field offices. NPCA has over 1.5 million members and supporters nationwide, including 7,423 NPCA members and supporters in Idaho. NPCA is active nationwide in advocating for strong air quality requirements to protect our parks, including submission of petitions and comments relating to visibility issues, regional haze State Implementation Plans, climate change and mercury impacts on parks, and emissions from power plants, oil and gas operations and other sources of pollution affecting national parks and communities. NPCA's members live near, work at, and recreate in all the national parks, including those directly affected by emissions from Idaho's sources.

The Coalition to Protect America's National Parks ("Coalition") is a non-profit organization composed of over 2,100 retired, former and current employees of the National Park Service. The Coalition studies, speaks, and acts for the preservation of America's National Park System. As a group, we collectively represent over 40,000 years of experience managing and protecting America's most precious and important natural, cultural, and historic resources.

The Conservation Organizations have concerns with DEQ's Proposed SIP, many of which echo concerns raised in the National Park Service's ("NPS") and U.S. Forest Service's ("USFS") consultation comments included in Appendix F of the Proposed SIP. The Conservation Organizations' overarching concern is that that the NPS's consultation comments included detailed cost-effectiveness analyses for Idaho's sources and found that for most of the sources controls are cost effective, which were largely ignored by DEQ. We reviewed the NPS's analyses and concur with the analyses. Moreover, we strongly urge DEQ to require emission limitations in the SIP for those sources with cost-effective controls. This letter details these concerns and requests that DEQ make substantial edits to the Proposed SIP prior to submission to the U.S. Environmental Protection Agency ("EPA") to ensure reasonable progress is made in Idaho's Class I areas and Class I areas in the region.

I. BACKGROUND INFORMATION

Idaho's two Class I areas, Craters of the Moon National Monument and Preserve and Yellowstone National Park. Craters of the Moon National Monument and Preserve protects a vast "weird and scenic landscape" with remarkable and diverse volcanic features, sagebrush steppe ecosystems, and wilderness, which provides opportunities to explore, understand, and value the rugged and remote high desert landscape of the Great Rift Region. Yellowstone National Park, the world's first national park, was set aside in 1872 as a place to share the geothermal wonders and preserve and protect the scenery, wildlife, cultural heritage, and geologic and ecological systems and processes in their natural condition, for the benefit and enjoyment of present and future generations.

DEQ evaluated the following eight sources: (1) Clearwater Paper Corp, (2) Itafos Conda LLC, (3) J.R. Simplot - Don Siding Pocatello, (4) Northwest Pipeline LLC-Soda Springs, (5) P4 Production LLC, (6) TASC0-Nampa, (7) TASC0-Paul, and (8) TASC0-Twin Falls for reasonable progress controls. Based on NPCA's research, we know these sources contribute to visibility impairment not only Idaho's Class I areas but also to Class I areas in neighboring states. We urge DEQ to revise its SIP to require emissions controls on these facilities to not only clear the air in our national parks and wilderness areas, but in our communities, including environmental justice communities.

II. ISSUES IDENTIFIED IN THE PROPOSED SIP

A. Uniform Rate of Progress (URP) is not a "Safe Harbor."

Throughout its Proposed SIP DEQ asserts that because Idaho's Class I areas are currently below the adjusted uniform rate of progress needed to achieve the 2064 visibility end goal and are projected to remain below the rate of progress through 2028, DEQ's sources need not install controls during this planning period. As EPA's 2021 July 2021 Clarification Memo stated, SIPs "that conclude that additional controls, including potentially cost-effective and otherwise reasonable controls, are not needed because the Class I areas in the state (and those out-of-state areas affected by emissions from the state) are below their uniform rates of progress (URPs)" have not "answer[ed] the question of whether the amount of progress made in any particular implementation period is 'reasonable progress.'"² EPA explained that its "2017 RHR preamble and the August 2019 Guidance clearly state that it is not appropriate to use the URP in this way, i.e., as a 'safe harbor.'"³

The EPA Clarification memo provides:

The URP is a planning metric used to gauge the amount of progress made thus far and the amount left to make. It is not based on consideration of the four statutory factors and, therefore, cannot answer the question of whether the amount of progress made in any particular implementation period is "reasonable progress." This concept was explained in the RHR preamble. Therefore, states must select a reasonable number of sources and evaluate and determine emission reduction measures that are

² Memorandum from Peter Tsirigotis, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors Regions 1-10, "Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period," (July 9, 2019), at 15, <https://www.epa.gov/visibility/clarifications-regarding-regional-haze-state-implementation-plans-second-implementation>. ("Clarification Memo").

³ July 2021 Clarification Memo at 15-16; *see also* Memorandum from Peter Tsirigotis, Director at EPA Office of Air Quality Planning and Standards, to EPA Air Division Directors Regions, "Guidance on Regional Haze State Implementation Plans for the Second Implementation Period," EPA-457/B-19-003, at 25 (Aug. 2019), [8-20-2019 - regional haze guidance final guidance.pdf \(epa.gov\)](https://www.epa.gov/visibility/8-20-2019-regional-haze-guidance-final-guidance.pdf). ("Guidance").

necessary to make reasonable progress by considering the four statutory factors.⁴

Therefore, it is inappropriate for DEQ to use visibility conditions and the status of the glideslope to justify inaction in this plan and in doing so is failing to make reasonable progress to continue cleaning up haze pollution incrementally. We urge the state to modify the Proposed SIP by requiring measures of pollution reduction to satisfy the requirement to make reasonable progress, and not lean improperly on the URP to justify doing nothing.

B. DEQ Failed to Require the Appropriate Four-Factor Analysis for Its Sources and Must Make Corrections

DEQ's Proposed SIP only includes *proposed* controls for two of its sources: TASCO-Nampa⁵ and TASCO-Twin Falls.⁶ TASCO-Nampa's commitment to switch from coal to natural gas must be made enforceable in the SIP, there is no regulatory language proposed. However, it does not address the NO_x emissions from the B&W Boiler, which the NPS calculated cost-effective for SCR at \$2,433/ton, and we concur with the NPS that DEQ should require. The language for TASCO-Twin Falls does not include any provisions for monitoring, recordkeeping and reporting of emissions. Moreover, in addition to allowing for the use of coal, the Twin Falls proposed SIP provision allows for the use of fuel oil during startup, which DEQ failed to disclose in its Proposed SIP. A Four-Factor Analysis determination applies at all times, and DEQ must remove the option to allow for the use of fuel oil during startup. Once the SIP is revised, DEQ must renotify and provide an opportunity for the public to review and comment.

Furthermore, DEQ must make the following corrections to its Four-Factor Analyses for each of the following sources.

1. Clearwater Paper Corporation.

For the Clearwater Paper Corporation and other sources where it relies on this threshold, DEQ must reconsider its \$6,100 cost-effectiveness threshold.

⁴ Clarification Memo at 15-16.

⁵ Proposed SIP at 79 (TASCO—Twin Falls' Tier I Permit, T1-2016.0017, issued on November 5, 2021 (Appendix E) • Foster Wheeler Boiler – permit condition 4.9 (“Fuel Limit and Future Natural Gas Fuel Use The Foster Wheeler Boiler shall be fueled exclusively by coal, except during startup when fuel oil may also be used to ignite the coal. On and after January 1, 2023 the Foster Wheeler Boiler shall be fueled exclusively by natural gas and Baghouse A-B1 is no longer needed as a control device.”), • B&W Boiler – permit condition 5.2 (“The permittee shall only combust natural gas as fuel in the B&W Boiler.”).

⁶ Proposed SIP at 79 (TASCO—Nampa • The elimination of the coal will be made federally enforceable through a permit action and will be submitted to EPA as an amendment to this SIP no later than August 1, 2023.)

DEQ failed to propose SCR controls at Power Boiler 4 based on a cost-effectiveness. DEQ set a cost-effectiveness threshold for the second implementation period of \$6,100/ton. Using such a low threshold, DEQ argued that the figure of \$9,556/ton was greater than the threshold of \$6,100/ton it set. For Power Boiler 4, \$9,556/ton is lower than the cost-effectiveness thresholds being established for the second round regional haze plans by several states, for example Oregon (\$10,000/ton⁷) and Colorado (\$10,000/ton).⁸ Therefore, DEQ must include SIP control measures representing SCR controls at Power Boiler 4.

2. Itafos Conda LLC.

The public lacks information upon which to comment regarding what DEQ is relying on for the Four-Factor Analysis for. For example, the NPS expressed concern that the source revised their cost estimate vendor quotes without justification and DEQ explained, without providing a citation, that “EPA Cost Control Manual allows for a recent vendor quote (within the last 5 years) to be adjusted to current dollars.”⁹ DEQ then summarily explained that, it determined that Itafos used appropriate methods to adjust a vendor quote to accurately reflect current dollars,¹⁰ but failed to explain what those methods were. The NPS comments explained that, the source revised the information and increased the purchased equipment costs without additional justification, and DEQ’s Proposed SIP failed to include the documentation. The cost-effectiveness figure calculated by Itafos is inflated and the NPS’s calculations demonstrate that SO₂ controls are cost-effective.¹¹ NPS thus recommended that IDEQ revise the SIP to require SO₂ scrubbing at the Itafos facility. For this source, the DEQ must provide the public will full documentation of the missing information. DEQ must ensure a Four-Factor Analysis and emission controls are included in the SIP for this source.

3. J.R. Simplot - Don Siding Pocatello.

DEQ erroneously relies on EPA’s 2015 Consent Decree as the basis for this source to escape SO₂ controls. This is despite the source ranking number one for SO₂ impacts to Craters of the Moon National Monument and Preserve as well as Yellowstone and Grand Teton National Parks even with the Consent Decree controls in place. As the NPS’s comments explained to DEQ, a Four-Factor Analysis is required, DEQ must not rely an outdated EPA agreement, which was not entered into to meet the Clean Air Act’s Regional Haze Reasonable Progress Four-Factor

⁷ See, e.g., September 9, 2020 letter from Oregon Department of Environmental Quality to Collins Forest Products, at 1-2, <https://www.oregon.gov/deq/aq/Documents/18-0013CollinsDEQletter.pdf>.

⁸ See Colorado Department of Public Health and Environment, In the Matter of Proposed Revisions to Regulation No. 23, November 17 to 19, 2021 Public Hearing, Prehearing Statement, at 7. (Ex. 3).

⁹ Proposed SIP, Appendix F at PDF 7.

¹⁰ Proposed SIP, Appendix F at PDF 7.

¹¹ Proposed SIP, Appendix F, at 11, Table 3.

Analysis requirements as the basis for the source to escape controls. Moreover, as the NPS comments explained, there are sources will lower SO₂ emission rates in the RACT/BACT/LAER clearinghouse. DEQ must ensure a SO₂ Four-Factor Analysis is conducted and emission controls are included in the SIP for this source. As the NPS' consultation comments explained, additional information, including recent emissions for individual emission units and vendor quotes are necessary to complete a thorough evaluation of the phosphate fertilizer manufacturing source.

The NPS explained that because the Itafos analysis included a vendor quote for a packed tower wet scrubber using hydrogen peroxide and caustic soda as scrubbing reagents and the Simplot plants have higher permitted production capacity but are similar to the Itafos facility plant, the NPS used the Itafos vendor quote PEC and the “six-tenths” rule to apply these costs to the Simplot plants. The NPS explained that it detailed all analysis assumptions in the written documentation. The NPS’s cost-effectiveness figures for Plant Nos. 300 and 400 are seen in the below table.¹² As seen in the below table, the NPS’s cost-effectiveness figures demonstrate that scrubbers on the Simplot sulfuric acid plants are cost-effective for Plants No. 300 and 400, reducing emissions by 98% or roughly 733 TPY. Thus, DEQ must ensure that Four-Factor Analyses are conducted and emission controls are included in the SIP for these plants.

Plant No.	H ₂ O ₂ Scrubber Costs (2020\$)	Caustic Scrubber Costs (2020\$)	H ₂ O ₂ Scrubber % of IDEQ Cost Threshold (\$6,100/ton)	Caustic Scrubber % of IDEQ Cost Threshold (\$6,100/ton)
No. 300	\$3,893	\$3,099	64%	51%
No. 400	\$3,712	\$3,263	61%	53%

4. Northwest Pipeline LLC-Soda Springs.

The Northwest Pipeline Soda Springs facility is a natural gas compression station located in southeastern Idaho. The facility has four natural gas-fired lean-burn reciprocating internal combustion engines (RICE). The Soda Springs Compressor Station operates remotely and is used to compress and transmit natural gas along their natural gas transmission pipeline. NO_x pollutants from the following units were selected for analysis: Units 1-3 (Dresser Rand-Clark TLA-6 natural gas-fired internal combustion engine, 1,700 bhp, installed 1956); Unit 4 (Dresser Rand-Clark TCVA-16 natural gas-fired internal combustion engine, 6,000 bhp, installed 1969). Notably, these units were installed many years ago and are 66 and 53 years old, respectively. In response to the NPS’s concerns, DEQ offered that the source used EPA’s Control Cost Manual, but failed to provide citations and discussion. DEQ must consider the information contained in the NPCA-commissioned comprehensive reports on reasonable progress Four-Factor Analysis

¹² NPS Formal Consultation Call with Idaho Department of Environmental Quality, at 26 (Feb. 24, 2022).

for the oil and gas industry applicable to natural gas compression stations and this source, which are included as exhibits with these comments.¹³

5. P4 Production LLC.

DEQ erroneously relies on information in a 2009 BART analysis as its basis to avoid the required Four-Factor Analysis. The analysis is outdated, and as the NPS's comments indicate, at least one other source in the source in the U.S. has successfully installed a SCR on a rotary kiln. Therefore, DEQ must ensure that a Four-Factor Analysis is conducted for P4 Production LLC.

6. TASCOPaul, Twin Falls, Nampa.

For all three sources DEQ uses methodology that does not comport with EPA's Control Cost Manual, which the NPS documented, and DEQ ignored. Moreover, each of the emission unit source must be evaluated under a Four-Factor Analysis and controls applied. DEQ's proposed approach of allowing for over control at the Twin Falls source to in effect offset controls at the other sources is not provides for under the Act and EPA's regulation. Moreover, DEQ's argument that its Class I areas are under the URP also fails. Controls must be established this planning period. Visibility is not a fifth factor, the Act only has "four" factors. Finally, as the NPS's comments elaborate, and DEQ failed to respond to, DEQ's control efficiency control estimates were both too low and failed to provide adequate justification for the estimates.

¹³ See, Stamper Expert Report March 2020; *see also*, Stamper Expert Report July 2020.

C. DEQ Must Analyze Environmental Justice Impacts of its Regional Haze SIP, and Must Ensure Its SIP Will Reduce Emissions and Minimize Harms to Disproportionately Impacted Communities

1. DEQ completely ignored the environmental justice communities impacted by Idaho’s polluting sources.

Sources that harm the air in our treasured Class I areas are also located in environmental justice areas across the State. By evaluating the vulnerable communities and counties impacted by these sources, we believe DEQ will identify emission-reducing options that if required will improve air quality and help achieve reasonable progress in this round of regional haze rulemaking. Historically, conservation and environmental work has concerned itself with protecting nature from people and has thus “siloe” its work (e.g., mainstream conservation vs. environmental justice.) While this siloe approach has led to the protection of many vulnerable habitats, it ignores the reality that people live in concert with and are a part of nature; to protect one and not the other is a job half done. By considering viewshed protection and environmental justice at the same time, we can collectively begin to dismantle the silos that exist in conservation and environmental work and chart a new path forward.

2. DEQ can facilitate EPA’s consideration of environmental justice to comply with Federal Executive Orders.

There are specific legal grounds for considering environmental justice when determining reasonable progress controls. Under the CAA, states are permitted to include in a SIP measures that are authorized by state law but go beyond the minimum requirements of federal law.¹⁴ Ultimately, EPA will review the Final Haze Plan that submits, and EPA will be required to ensure that its action on DEQ’s Haze Plan addresses any disproportionate environmental impacts of the pollution that contributes to haze, and is subject to the current Administration’s “Executive Order on Tackling the Climate Crisis at Home and Abroad.”¹⁵ ¹⁶ Idaho

¹⁴ See *Union Elec. Co v. EPA*, 427 U.S. 246, 265 (1976) (“States may submit implementation plans more stringent than federal law requires and . . . the Administrator must approve such plans if they meet the minimum requirements of s 110(a)(2).”); *Ariz. Pub. Serv. Co. v. EPA*, 562 F.3d 1116, 1126 (10th Cir. 2009) (citing *Union Elec. Co.*, 427 U.S. at 265) (“In sum, the key criterion in determining the adequacy of any plan is attainment and maintenance of the national air standards . . . ‘States may submit implementation plans more stringent than federal law requires and [] the [EPA] must approve such plans if they meet the minimum [CAA] requirements of § 110(a)(2).’”); *BCCA Appeal Group v. EPA*, 355 F.3d 817, 826 n.6 (5th Cir. 2003) (“Because the states can adopt more stringent air pollution control measures than federal law requires, the EPA is empowered to disapprove state plans only when they fall below the level of stringency required by federal law.”)

¹⁵ Exec. Order No. 14008, 86 Fed. Reg. 7,619 (Jan. 27, 2021).

¹⁶ Exec. Order No. 14008 at § 201 (It is the policy of [this] Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach

can facilitate EPA's compliance with these Executive Orders by considering environmental justice in its SIP submission.

3. DEQ ignored EPA's Regional Haze Guidance and Clarification Memo, which directs states to take environmental justice concerns and impacts into consideration.

EPA's 2021 Clarification Memo directs states to take into consideration environmental justice concerns and impacts in issuing any SIP revision for the second planning period.¹⁷ EPA's 2019 Regional Haze Guidance for the Second Planning Period specifies, "States may also consider any beneficial non-air quality environmental impacts."¹⁸ This includes consideration of environmental justice in keeping with other agency policies. For example, EPA also pointed to another agency program that states could rely upon for guidance in interpreting how to apply the non-air quality environmental impacts standard:

When there are significant potential non-air environmental impacts, characterizing those impacts will usually be very source- and place-specific. Other EPA guidance intended for use in environmental impact assessments under the National Environmental Policy Act may be informative, but not obligatory to follow, in this task.¹⁹

Additionally, a collection of EPA policies, guidance and directives related to the National Environmental Policy Act ("NEPA") is available at <https://www.epa.gov/nepa/national-environmental-policy-act-policies-and-guidance>. One of these policies concerns Environmental Justice.²⁰ Idaho should consider these sources of information in conducting a meaningful environmental justice analysis.

that reduces climate pollution in every sector of the economy; ... protects public health ... delivers environmental justice ... [and that] ... [s]uccessfully meeting these challenges will require the Federal Government to pursue such a coordinated approach from planning to implementation, coupled with substantive engagement by stakeholders, including State, local, and Tribal governments.)

¹⁷ Clarification Memo at 16.

¹⁸ Guidance at 49.

¹⁹ Guidance at 33.

²⁰ See EPA, "EPA Environmental Justice Guidance for National Environmental Policy Act Reviews," <https://www.epa.gov/nepa/environmental-justice-guidance-national-environmental-policy-act-reviews>.

4. EPA must consider environmental justice when it reviews and takes action on Idaho's SIP

As occurred in the first planning period, if a state fails to submit its SIP on time, or if EPA finds that all or part of a state's SIP does not satisfy the Regional Haze regulations, then EPA must promulgate its own Federal Implementation Plan ("FIP") to cover the SIP's inadequacy. Should EPA promulgate a FIP that reconsiders a state's Four-Factor Analysis, it is completely free to reconsider any aspect of that state's analysis. The two Presidential Executive Orders referenced above require that federal agencies integrate Environmental Justice principles into their decision-making. EPA has a lead role in coordinating these efforts, and EPA Administrator Regan directed all EPA offices to clearly integrate environmental justice considerations into their plans and actions.²¹ Consequently, should EPA promulgate a FIP for Idaho sources, it has an obligation to integrate Environmental Justice principles into its decision-making. The non-air quality environmental impacts of compliance portion of the third factor, is a pathway for doing so.

5. DEQ must consider environmental justice under Title VI of the Civil Rights Act

As EPA must consider Environmental Justice, so must DEQ and all other entities that accept Federal funding. Under Title VI of the Civil Rights Act of 1964, "no person shall, on the ground of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity...". DEQ has an obligation to ensure the fair treatment of communities that have been environmentally impacted by sources of pollution. That means going beyond the flawed analysis conducted and ensuring "meaningful involvement" of impacted communities; environmental justice also requires the "fair treatment" of these communities in the development and implementation of agency programs and activities, including those related to the SIP.

DEQ must conduct a thorough analysis of the current and potential effects to impacted communities from sources considered in the SIP. By not conducting this analysis and including the benefits of projected decline in emissions to these communities in their determination of the included emission sources, Idaho is not fulfilling its obligations under the law. Moreover, the state is making a mockery of

²¹ See EPA News Release, "EPA Administrator Announces Agency Actions to Advance Environmental Justice, Administrator Regan Directs Agency to Take Steps to Better Serve Historically Marginalized Communities," (April 7, 2021), <https://www.epa.gov/newsreleases/epa-administrator-announces-agency-actions-advance-environmental-justice>.

Title VI by not using the SIP requirements to bring about the co-benefits of stronger reductions measures and reduce harms based on continued emissions.

CONCLUSION

In conclusion, we request that DEQ revise the Proposed SIP in the following ways before submitting to the EPA:

1. Remove the inappropriate reference to the URP as a “safe harbor.” That Idaho’s Class 1 areas are on the so-called glidepath is not an excuse for avoiding emission reductions.
2. Require additional SIP measures of air pollution reduction in order to satisfy the Act’s requirement that reasonable progress is being made.
3. Reduce impacts of air pollution at both the Class I areas and on the environmental justice communities.

Thank you for the opportunity to review the Proposed SIP. We look forward to seeing a revised plan that takes our comments into consideration.

Sincerely,

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Enclosures