

ANTHONY A. WILLIAMS

February 13, 2004

Donald S. Welsh Regional Administrator United States Environmental Protection Agency Region 3 1650 Arch Street Philadelphia, PA 19103-2029

Dear Mr. Welsh:

Data from ambient air quality monitoring stations in the District of Columbia for the past three years show concentrations in excess of the annual national ambient air quality standard (NAAQS) for fine particulate matter (PM_{2.5}). Accordingly, the District may qualify as a non-attainment area for the PM_{2.5} annual NAAQS.

Because of the regional nature of PM_{2.5} pollution, I am recommending that, at a minimum, the entire Washington DC-MD-VA metropolitan statistical area (MSA) be designated as a non-attainment area for the PM_{2.5} annual NAAQS. I base my recommendation on EPA's April I, 2003 memorandum with guidance to State and local pollution control agencies and Tribes on the process for designating areas for the purpose of implementing the PM_{2.5} NAAQS. I also support the idea of using the larger Washington-Baltimore DC-MD-VA-WV consolidated metropolitan statistical area (CMSA) for this purpose. This would be similar to that being proposed for the ozone 8-hour NAAQS non-attainment boundaries where CMSAs will determine the attainment or non-attainment designation while the State Implementation Plans (SIPs) are developed within the MSA boundaries.

If you need further information on this matter, please call Theodore J. Gordon, Senior Deputy Director for Environmental Health Science and Regulation in the Department of Health, at 202-442-8982.

Sincerely,

Anthony A. Williams

Mayor

ec: Judith M. Katz, Director, Air Protection Division, EPA Region 3