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west virginia department of environmental protection

Executive Office
601 57th Street SE
Charleston, WV 25304

Joe Manchin III, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

February 4, 2005

Donald S. Welsh
Regional Administrator
U.S. EPA Region III
1650 Arch Street (3RA00)
Philadelphia, PA 19103-2029

RECEIVED

FEB 8 2005

Air Protection Division (3A00)

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FEB 8 2005

Division Director (3A00)

Re: Request for Revision to Designations for
Specific West Virginia Counties Under the
PM_{2.5} Standards

Dear Mr. Welsh:

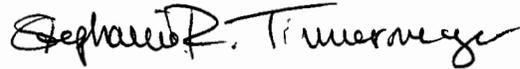
The State of West Virginia is herein requesting that the U.S. Environmental Protection Agency (EPA) revise its air quality designations for three counties. Based upon the most recent air quality data, we are requesting that the full counties of Harrison, Marion and Monongalia be designated as attainment for the PM_{2.5} air quality standards. The West Virginia Department of Environmental Protection (WVDEP) worked closely with EPA Region III senior staff to develop designation recommendations based upon certified data for the period 2001-2003. We recommended that Marion County, with a design value of 15.42 µg/m³, be designated nonattainment. Further, we initially recommended that the full counties of Harrison and Monongalia be designated attainment based upon their respective annual design values: 13.96 µg/m³ and 14.89 µg/m³.

At EPA's insistence, we amended our original recommendation to designate as nonattainment, portions of these two counties that contained power plants. EPA alleged that emissions from these plants contributed to nonattainment in Marion County. The agency subsequently designated Marion County, part of Harrison County (Tax District of Clay), and part of Monongalia County (Tax District of Cass) as nonattainment for PM_{2.5} (70 Fed. Reg. @ 1014). The accompanying preamble stipulates that states may submit quality assured, certified 2004 data and request a change of designation where appropriate. In a letter dated January 12, 2005, the WVDEP notified EPA that the final 2004 PM_{2.5} data had been uploaded to EPA's Air Quality Subsystem (AQS) and certified. This data verifies that all three counties are attaining the PM_{2.5} standards: Harrison (13.58 µg/m³), Marion (14.81 µg/m³), and Monongalia (14.52 µg/m³). Moreover, Harrison and Monongalia Counties have continuously monitored attainment since we

began collecting PM_{2.5} air quality data there in 1999. Based upon the aggregate clean data, we are now requesting that EPA revise the designations for the three full counties to attainment.

If you or your staff have any questions or would like additional information, please feel free to contact me or John Benedict, Director of WVDEP's Division of Air Quality.

Sincerely,



Stephanie R. Timmermeyer
Cabinet Secretary

cc: Ms. Judith M. Katz, Director
Air Protection Division

John Benedict, Director