



COMMONWEALTH of VIRGINIA

Office of the Governor

P.O. Box 1475

Richmond, Virginia 23218

July 19, 2004

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

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

Dear Mr. Welsh:


Governor Warner asked me to respond to your recent letter regarding EPA's proposed designations for PM 2.5 in Virginia.

The Commonwealth is disappointed that EPA chose to include 9 Virginia localities as nonattainment when the air quality data shows attainment. For the period from 2001 through 2003 the three-year averages of air quality monitoring data in Northern Virginia all show attainment of the PM 2.5 standards.

The Department of Environmental Quality (DEQ) staff is looking forward to discussions with Region III personnel to resolve our concerns. However, I believe these discussions would be more productive if EPA releases the implementation guidance for PM 2.5 prior to the September 1, 2004, deadline for the Commonwealth to respond. Should you have any questions or comments feel free to contact DEQ's John Daniel at 804-698-4311.

Thank you for your letter.

Sincerely,



W. Tayloe Murphy, Jr.

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Air Protection Division (3AP21)

c: The Honorable Mark R. Warner
Mr. Robert G. Burnley
Mr. John Daniel

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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUG 09 2004

The Honorable W. Tayloe Murphy, Jr.
Secretary of Natural Resources
Commonwealth of Virginia
Office of the Governor, P.O. Box 1475
Richmond, Virginia 23218

Dear Secretary Murphy:


Thank you for your letter of July 19, 2004 responding to the U.S. Environmental Protection Agency (EPA) proposed designations of areas for the fine particulate matter (PM_{2.5}) national ambient air quality standard in Virginia.

As required by statute and EPA guidance, the Agency must designate areas that include counties violating the standard, as well as nearby counties that may contribute to a violation of the standard, as nonattainment. Thus, while no counties in Virginia have monitored a violation, our analysis indicated that the counties and cities we have proposed for designation as nonattainment contribute to the nonattainment problem in the Washington, D.C. area. This analysis included factors such as population, traffic, growth, meteorology, geography and jurisdictional boundaries. During our meeting on July 29, 2004 with Mr. John Daniel, Director of Virginia's Air Division, we provided a detailed explanation of the factors that led up to our proposed designations.

As we noted in our letter of June 29, 2004 to Governor Mark Warner, we are interested in and will consider any additional information that you can provide to support your position. This information is requested by September 1, 2004, but we encourage the Commonwealth to have a continuing dialogue with EPA during the entire designation process.

EPA is currently working on the Implementation Guidance for PM_{2.5} and we will keep you informed of its status. In the meantime, please do not hesitate to call me or have your staff contact Ms. Catherine Libertz, Government Relations Team Leader, at 215-814-2737.

Sincerely,


Donald S. Welsh
Regional Administrator

