



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 18, 2007

Elin D. Miller, Regional Administrator
U. S. Environmental Agency, Region 10
1200 Sixth Ave
Seattle WA 98101

Dear Ms. Miller:

On behalf of the Governor, I am submitting the State of Washington's recommendations for designations for the revised fine particulate matter (PM_{2.5}) standard. The U.S. Environmental Protection Agency (EPA) strengthened the 24-hour PM_{2.5} standard to protect public health as of December 18, 2006. The revision of the standard from 65 µg/m³ to 35 µg/m³ triggered a designation process. The process provides Washington with the opportunity to make recommendations to EPA on designations one year after the revision of the standard. This letter provides the designation recommendations.

The Washington State Department of Ecology developed its recommendations from the most recent data (2004-2006) available from Federal Reference Method (FRM) PM_{2.5} monitors. A summary "Recommended Designations for the 24-Hour PM_{2.5} Standard" is enclosed. Generally our recommendations do not apply to tribal lands, which are the responsibility of EPA. An exception to this general rule is noted under the nonattainment recommendation below.

EPA has requested that the state propose a nonattainment area for any area recommended for designation as *Nonattainment*. The State of Washington is still completing its evaluation of an appropriate area for the recommended *Nonattainment* designation below. The State commits to making a recommendation to EPA on the proposed area by February 15, 2008.

RECOMMENDED DESIGNATIONS

Attainment

Monitors in King County (Lake Forest Park and Duwamish, Seattle), Snohomish County (Marysville), and Spokane County (Ferry Street, Spokane) meet the PM_{2.5} standard. We are recommending that these three counties be designated *Attainment*.



Nonattainment

The monitor in South Tacoma, Pierce County does not meet the standard. We are recommending the monitor be designated *Nonattainment*. Our recommended designation does not apply to trust lands within the Puyallup Indian Reservation, which are the responsibility of EPA. Congress explicitly provided state and local agencies authority over activities only on non-trust lands within the Puyallup Indian Reservation under the Puyallup Tribe of Indians Settlement Act of 1989, 25 U.S.C. 1773. As stated above, we will be recommending a proposed nonattainment area in the near future.

Unclassifiable for the Purpose of Extending the Deadline for Designations

We are recommending *Unclassifiable* for Clark County and Yakima County for the purpose of extending the deadline under the Clean Air Act by which EPA must make designations. The Clean Air Act allows EPA to take an additional year (in this case to December 2009) when EPA finds that data are insufficient for designations.

FRM monitors in Vancouver, Clark County and in Yakima, Yakima County do not have three complete years of data for 2004-2006. Monitors at both locations were removed as part of an EPA cost-saving initiative targeting monitors that were not measuring concentrations close to the previous standard of $65 \mu\text{g}/\text{m}^3$. The strengthening of the standard raised questions about whether these sites were meeting the revised standard. EPA had the state reinstall the monitors and begin monitoring on January 1, 2007.

Our expectation is that EPA would make a designation for the two counties in December 2009 based on calendar year 2007 and 2008 monitoring data and partial 2009 data with an extended effective date perhaps of 120 days. The extended effective date would allow us to complete data collection through the end of year, perform quality assurance, and submit full calendar year 2009 monitoring data to EPA. The result is that EPA would have a complete 2007-2009 data set to confirm its designations or show that one or both designation needs to be corrected. Our expectation is that EPA would make a designation of *Attainment* if the data show the standard is met and *Nonattainment* if it is not. We commit to assisting EPA apply the nine factors to determine a Nonattainment Area in the event of a *Nonattainment* designation.

The State of Washington believes that it is important that designations be based upon current, accurate monitoring data. We have noticed year-to-year variances in 98th percentile value $\text{PM}_{2.5}$ concentrations significant enough to affect attainment or nonattainment of the 24-hour $\text{PM}_{2.5}$ standard and hence the designation. We respectfully request that EPA consider and adopt the approach we have described above.

Unclassifiable for December 2008 Designations

We recommend that the remaining areas of the state be designated as *Unclassifiable* for the December 2008 designations. These areas include the portion of Pierce County

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outside of the Nonattainment Area, for which the state will provide recommendations by February 15, 2008. These areas also include the remainder of the state outside of the counties recommended for Attainment designation, and Clark and Yakima Counties for designation as *Unclassifiable* for the purpose of extending the deadline for designations.

Thank you for your consideration of our recommendations. Please contact Doug Schneider of my staff at (360) 407-6874 or dsch461@ecy.wa.gov if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Jay J. Manning for".

Jay J. Manning
Director

Enclosure

cc: Doug Schneider, Ecology
Sarah Rees, Ecology
Stu Clark, Ecology
Dennis McLarren, PSCAA
Keith Phillips, OFM
Gina Bonifacino, EPA Region 10

Recommended Designations for the 24-Hour PM_{2.5} Standard

Washington State Department of Ecology

December 18, 2007

The United States Environmental Protection Agency (EPA) revised the 24-hour federal health standard for fine particulate matter (PM_{2.5}) in the ambient air to 35 micrograms per cubic meter in December 2006 to improve protection of public health. PM_{2.5} refers to particulates with an aerometric diameter of 2.5 microns or less. Compliance with the PM_{2.5} standard is evaluated over a three-year period by averaging the 98th percentile value for the each calendar year to determine the design value. A design value of 35.5 micrograms per cubic meter or higher is a violation of the 24-hour PM_{2.5} standard.

SITE SITE NO.	98TH PERCENTILE			DESIGN VALUE 2004-2006	RECOMMENDED DESIGNATION
	2004	2005	2006		
<u>CLARK COUNTY</u>					
Moose Lodge, Vancouver 53-011-0013	43.7	34.4	n/a	n/a	Unclassifiable
<u>KING COUNTY</u>					
Duwamish, Seattle 53-033-0057	29.1	30.0	n/a*	n/a	Attainment
Lake Forest Park 53-033-0024	24.9	25.4	37.3	29	Attainment
<u>PIERCE COUNTY</u>					
L Street, Tacoma 53-053-0029	43.7	40.5	42.7	42	NONATTAINMENT
<u>SNOHOMISH COUNTY</u>					
Marysville 53-061-1007	28.2	37.1	32.5	33	Attainment
<u>SPOKANE COUNTY</u>					
Ferry Street, Spokane 53-063-0016	25.6	31.6	31.6	30	Attainment
<u>YAKIMA COUNTY</u>					
S 4th Ave, Yakima 53-077-0009	44.3	n/a	n/a	n/a	Unclassifiable

* The Duwamish site did not meet the level of data completeness required by EPA regulations during the third quarter of 2006. Elevated levels of PM_{2.5} normally occur in the first and fourth quarters. The maximum value of 35.3 µg/m³ in these two quarters combined with 95% data completeness indicates attainment of the standard in 2006.

Areas that violate a federal health standard are designated *Nonattainment*; areas that meet the standard, *Attainment*; and areas where more information is needed, *Unclassifiable*. States recommend designations to EPA. EPA will make the final determination in December 2008. EPA may take an additional year if available information is insufficient.

