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EPA, REGION III  
OFFICE OF REGIONAL ADMINISTRATOR

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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W. Tayloe Murphy, Jr.  
Secretary of Natural Resources

Robert G. Burnley  
Director

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February 18, 2005

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

Dear Mr. Welsh: *Don*

Pursuant to Section 107 (d) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I hereby submit this letter to formally request that EPA reconsider the pending designation of certain Northern Virginia jurisdictions as part of the Washington, D. C., nonattainment area under the fine particulate matter (PM<sub>2.5</sub>) National Ambient Air Quality Standards (NAAQS). EPA's intention to designate these jurisdictions as part of this nonattainment area was transmitted to us in your December 17, 2004, letter to Governor Warner.

Again, I would like to point out that, based on the most current air quality monitoring and design value data for 2002 to 2004 in the Virginia portion of the proposed nonattainment area, all the Northern Virginia monitors are in compliance with the PM<sub>2.5</sub> Standards. Furthermore, there have been no recorded violations of either the annual or 24-hour PM<sub>2.5</sub> standards in this area since PM<sub>2.5</sub> monitoring began. As shown in enclosure I, the current design values for all Virginia monitors remain below the annual fine particulate matter standard. We continue to believe that ambient air quality data should be used first and foremost in making jurisdictional designation decisions. In addition, in almost all cases, the design values for Virginia's PM<sub>2.5</sub> monitors have decreased from the previous 2001 to 2003 period (Enclosure II).

To further promote the case for reconsideration, a review of currently available PM<sub>2.5</sub> monitoring data for the period from 2002 to 2004 in the AIRS/AQS data base for the District of Columbia and Maryland has also been performed. This analysis tells a substantial story of the PM<sub>2.5</sub> air quality in the Washington, D. C., area. As shown in Enclosure III, there is only one monitor in the entire proposed Washington nonattainment area that is currently not in

compliance with the annual PM<sub>2.5</sub> standard. Furthermore, the design value for this monitor (in the District) is only slightly above the standard at 15.13 Micrograms per Cubic Meter. Although it is understood that this data may not be complete, we believe it nevertheless provides pertinent and valuable insight into the current air quality status of the area with regard to PM<sub>2.5</sub> pollution. This current air quality picture as a whole also further supports our position that a large control area is not necessary to address what appears to be a marginal and localized nonattainment situation.

Turning to the potential benefits of the proposed nonattainment area in terms of effective emissions controls, we offer an additional observation. It is acknowledged that the main contributor to elevated PM<sub>2.5</sub> concentrations in urbanized areas such as the Washington area is carbonaceous material. From an anthropogenic emissions standpoint, the major contributor to carbon emissions in urban areas are mobile sources. When these mobile emissions are further broken down, 50% of these mobile carbon emissions are generated by vehicle tire and brake wear. Obviously, this major category of emissions will not be readily amenable to "reasonable" control in the foreseeable future. This in turn adds to the already considerable uncertainty that effective local controls are currently available and will be effective in reducing ambient PM<sub>2.5</sub> concentrations.

In summary, we believe that the information and data provided above and enclosed, along with our previous correspondence on this subject, provides a compelling justification for EPA to reconsider its pending designation decision concerning the Northern Virginia area. Furthermore, I again urge EPA to designate the Virginia jurisdictions involved as attainment areas for the PM<sub>2.5</sub> standards. Thank you for the opportunity to submit this request on this important air quality issue.

Sincerely,



Robert G. Burnley

Enclosure

C: W. Tayloe Murphy, Jr.  
Judith Katz  
John M. Daniel, Jr.

DC-MD-VA PM2.5 FRM Sites, Annual Averages 2001-2004 (Excluding Regionally Concurred Exceptional Events)

	City/County	2001	2002	2003	3-year Avg	2002	2003	2004	3-year Avg	
DC	11-001-0041	Washington, DC	16.91	15.55	14.75	15.74	15.55	14.75	15.08	15.13
	11-001-0042	Washington, DC	15.04	15.57	13.38	14.66	15.57	13.38	14.70	14.55
	11-001-0043	Washington, DC	16.13	15.27	14.27	15.22	15.27	14.27	14.62	14.72
MD	24-003-0014	Anne Arundel Co.	12.76	12.41	11.27	12.15	12.41	11.27	12.50	12.06
	24-003-0019	Anne Arundel Co.	14.02	12.93	12.12	13.02	12.93	12.12	13.23	12.76
	24-003-1003	Anne Arundel Co.	15.62	15.35	14.79	15.25	15.35	14.79	15.33	15.16
	24-003-2002	Anne Arundel Co.	14.74	14.09	13.67	14.17	14.09	13.67	14.53	14.10
	24-005-1007	Baltimore Co.	14.85	14.09	13.55	14.16	14.09	13.55	13.67	13.77
	24-005-3001	Baltimore Co.	16.06	14.52	15.02	15.20	14.52	15.02	15.16	14.90
	24-015-0003	Cecil Co.	13.63	12.58	12.65	12.95	12.58	12.65	13.25	12.83
	24-025-1001	Harford Co.	13.62	12.22	12.47	12.77	12.22	12.47	12.90	12.53
	24-031-3001	Montgomery Co.	12.76	13.03	11.94	12.58	13.03	11.94	12.64	12.54
	24-033-8003	Prince George's Co.	na	15.42	12.64	14.03	15.42	12.64	13.33	13.80
	24-043-0009	Washington Co.	14.17	14.62	13	13.93	14.62	13.00	14.58	14.07
	24-510-0006	Baltimore	14.6	14.1	13.57	14.09	14.10	13.57	14.53	14.07
	24-510-0007	Baltimore	15.29	14.58	15.1	14.99	14.58	15.10	14.53	14.74
	24-510-0008	Baltimore	na	15.54	15.93	15.74	15.54	14.49	15.93	15.32
24-510-0035	Baltimore	16.31	15.18	16.23	15.91	15.18	16.23	15.98	15.80	
24-510-0040	Baltimore	17.42	15.69	16.81	16.64	15.69	16.81	16.48	16.33	
24-510-0049	Baltimore	15.74	15.09	15.36	15.40	15.09	15.36	15.47	15.31	

(missing Dec. 04 data)

(missing Dec. 04 data)

VA

51-013-0020	Arlington Co.	14.73	14.85	14.13	14.57	14.85	14.13	14.45	14.48
51-036-0002	Charles City Co.	13.56	12.44	12.37	12.79	12.44	12.37	12.24	12.35
51-041-0003	Chesterfield Co.	13.76	13.43	13.62	13.60	13.43	13.62	13.19	13.41
51-059-0030	Fairfax Co.	<b>14.33</b>	13.11	13.22	<b>13.55</b>	13.11	13.22	13.92	13.42
51-059-1005	Fairfax Co.	na	<b>13.66</b>	13.22	<b>13.44</b>	<b>13.66</b>	13.22	13.68	<b>13.52</b>
51-059-5001	Fairfax Co.	14.49	14.06	13.55	14.03	14.06	13.55	14.04	13.88
51-087-0014	Henrico Co.	13.47	13.68	14.01	13.72	13.68	14.01	13.56	13.75
51-087-0015	Henrico Co.	12.96	13.05	12.80	12.94	13.05	12.80	12.48	12.78
51-107-1005	Loudoun Co.	14.11	13.48	13.08	13.56	13.48	13.08	14.07	13.54
51-139-0004	Page Co.	13.26	13.18	12.40	12.95	13.18	12.40	12.09	12.56
51-520-0006	Bristol	15.15	14.09	13.82	14.35	14.09	13.82	13.85	13.92
51-550-0012	Chesapeake	13.45	11.81	12.30	12.52	11.81	12.30	na	12.06
51-650-0004	Hampton	<b>13.57</b>	11.65	12.42	<b>12.55</b>	11.65	12.42	12.18	12.08
51-680-0014	Lynchburg	14.43	13.79	na	14.11	13.79	na	na	na
51-680-0015	Lynchburg	na	na	<b>13.50</b>	na	na	<b>13.50</b>	12.13	<b>12.82</b>
51-700-0013	Newport News	12.00	11.90	11.81	11.90	11.90	11.81	na	11.86
51-710-0024	Norfolk	13.58	12.50	12.78	12.95	12.50	12.78	12.73	12.67
51-760-0020	Richmond	14.68	13.45	13.81	13.98	13.45	13.81	<b>14.49</b>	<b>13.92</b>
51-770-0014	Roanoke	14.79	14.37	13.50	14.22	14.37	13.50	13.54	13.80
51-775-0010	Salem	15.10	15.09	13.79	14.66	15.09	13.79	14.28	14.39
51-810-0008	Virginia Beach	12.74	12.24	12.75	12.58	12.24	12.75	12.41	12.47

Numbers in bold italics did not meet summary data capture requirements  
Monitors in the Washington Area





**Virginia Department of Environmental Quality  
2002-2004 PM2.5 Annual Arithmetic Means  
Units, Micrograms per Cubic Meter**

County/City	AIRS ID	2002	2003	2004	3-Year Average
<b>Southwest Virginia Area:</b>					
Bristol	515200006	14.1	13.8	13.9	13.9
<b>Roanoke/Lynchburg Area:</b>					
Roanoke	517700014	14.4	13.5	13.5	13.8
Salem	517750010	15.1	13.8	14.3	14.4
Lynchburg	516800014	13.8	Disc.		NA
Lynchburg	516800015		13.5*	12.1	NA
<b>Richmond Area:</b>					
Chesterfield Co.	510410003	13.5	13.6	13.2	13.4
Henrico Co. - Math & Science Ctr.	510870014	13.7	14.0	13.6	13.8
Henrico Co. - DEQ Piedmont Office	510870015	13.1	12.8	12.5	12.8
Charles City Co.	510360002	12.5	12.4	12.2	12.4
Richmond	517600020	13.5	13.8	Disc.	13.7
<b>Tidewater Area:</b>					
Chesapeake	515500012	11.9	12.3	Disc.	12.1
Hampton	516500004	11.7	12.4	12.2	12.1
Newport News	517000013	11.9	11.8	Disc.	11.9
Norfolk	517100024	12.6	12.8	12.7	12.7
Virginia Beach	518100008	12.4	12.8	12.4	12.5
<b>Northern Virginia Area:</b>					
Arlington Co.	510130020	15.0	14.1	14.5	14.5
Loudoun Co.	511071005	13.5	13.1	14.1	13.6
Fairfax Co. - Lee Park	510590030	13.2	13.2	13.9	13.4
Fairfax Co. - McLean	510595001	14.2	13.6	14.0	13.9
Fairfax Co. - Annandale	510591005	13.8*	13.2	13.7	NA
<b>Transport Monitoring Site:</b>					
Page Co.	511390004	13.2	12.4	12.1	12.6

\* - Incomplete data capture for the year

Disc. - Discontinued

