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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

west virginia department of environmental protection

Executive Office
601 57th Street SE
Charleston, WV 25304

Bob Wise, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

November 9, 2004

Donald S. Welsh
Regional Administrator
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Re: Final modifications to the preliminary PM_{2.5} designation
boundary recommendations for the State of West Virginia

Dear Mr. ^{Don} Welsh:

In a letter to Governor Wise dated June 29, 2004, you advised that EPA intended to modify the State's designation recommendations by adding four counties to the potential PM_{2.5} nonattainment areas (Harrison, Mason, Monongalia and Pleasants). In doing so, EPA made a radical departure from the approach used in the recent 8-hour ozone designations. We continue to believe that this unilateral action is unnecessary and ill-advised. We expressed this concern in a letter to you dated August 31, 2004. Further we recommended that, should EPA pursue this course to which we are strongly opposed, only portions of the additional counties be included in the respective nonattainment areas. We then proposed alternative boundaries that included the emission sources which EPA alleges as contributing to nonattainment in nearby areas. EPA Region III senior staff advised the Division of Air Quality that these recommendations apparently did not meet the tenuous, elusive and continually shifting criteria from EPA headquarters. Our staff worked closely with the regional staff to redefine the boundaries into a more acceptable form. We are herein presenting these to EPA as our final State proposal (Attachment).

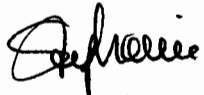
Nevertheless, we again remind EPA that large emitters which are adjacent to, or near, the primary PM_{2.5} nonattainment area would be assessed as to their impact in any nonattainment evaluation such as modeling, attainment demonstrations or control strategy development. That analysis would be regional in scope and include the large nearby emitters which would eliminate the need to expand the boundaries to include an adjacent county, or parts thereof, in the initial non-attainment area. The WVDEP possesses the authority to regulate any stationary source within the State that may require emissions control to achieve and maintain the National Ambient Air Quality Standards, regardless of whether the source is located in a nonattainment

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area. The WVDEP would exercise this authority as needed to achieve attainment in a timely manner. For these reasons and many we have voiced before, we urge once more that EPA consider removing the additional counties entirely.

If you or your staff have any questions or would like additional information, please feel free to contact me at the address or phone number shown in the letterhead. Alternatively, Director John Benedict (Division of Air Quality) may be reached at (304) 926-0462.

Sincerely,



Stephanie R. Timmermeyer
Cabinet Secretary

att

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

John Benedict, Director

Attachment-1.01

Final State Recommended PM_{2.5} Nonattainment Boundaries

Area:	County	Portion	Description of Partial Counties
Charleston	Kanawha	WHOLE	na
	Putnam	WHOLE	na
Huntington	Cabell	WHOLE	na
	Wayne	WHOLE	na
	Mason	Part	Tax Districts of: Graham, Robinson, and Waggener
Fairmont	Marion	WHOLE	na
	Harrison	Part	Tax Districts of: Clay and Eagle
	Monongalia	Part	Tax Districts of: Cass and Clay
Martinsburg	Berkeley	WHOLE	na
Parkersburg	Wood	WHOLE	na
	Pleasants	Part	Tax District of: Grant
Weirton	Brooke	WHOLE	
	Hancock	WHOLE	
Wheeling	Marshall	WHOLE	
	Ohio	WHOLE	

Attachment 1.02

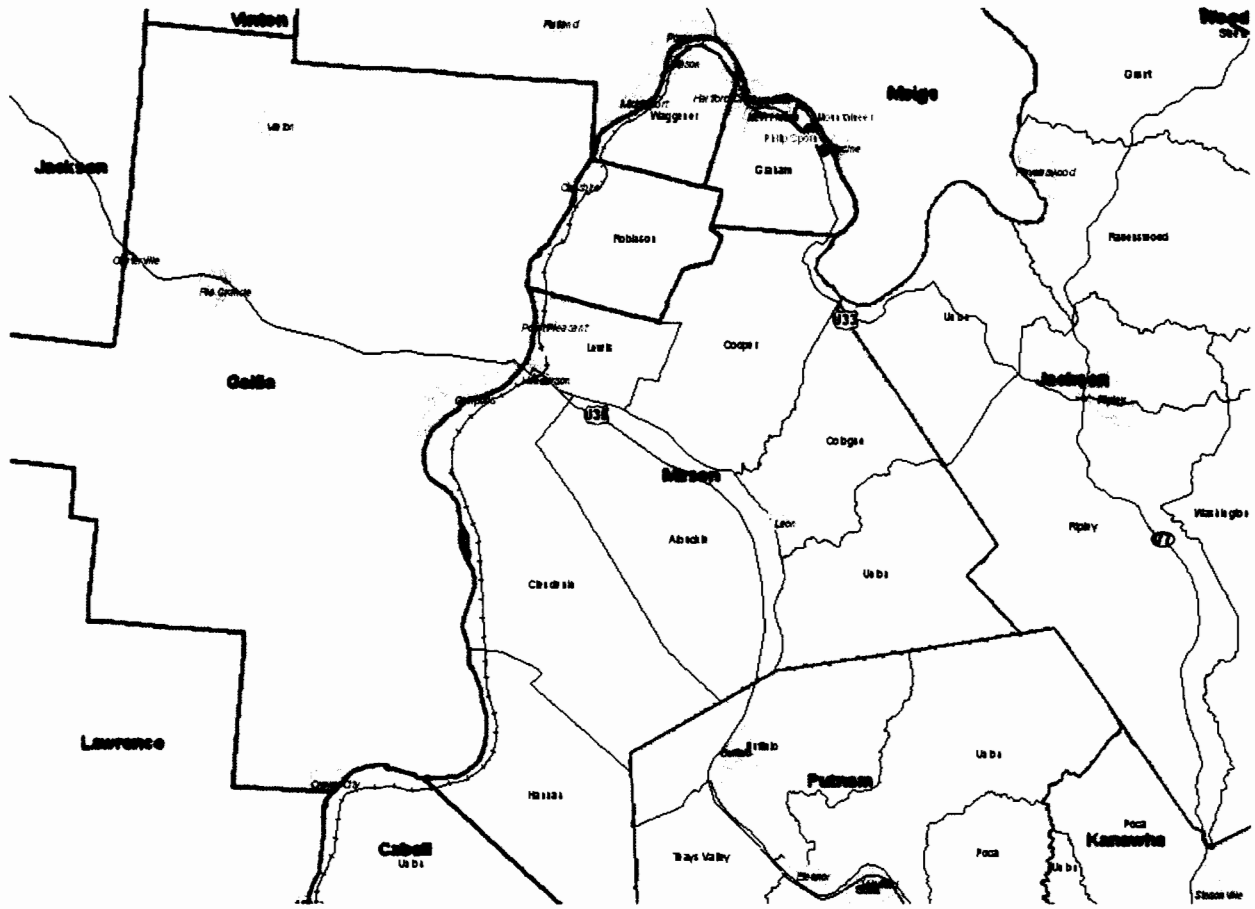


Figure 1 Nonattainment portions of Mason County and nearby areas outlined in dark blue

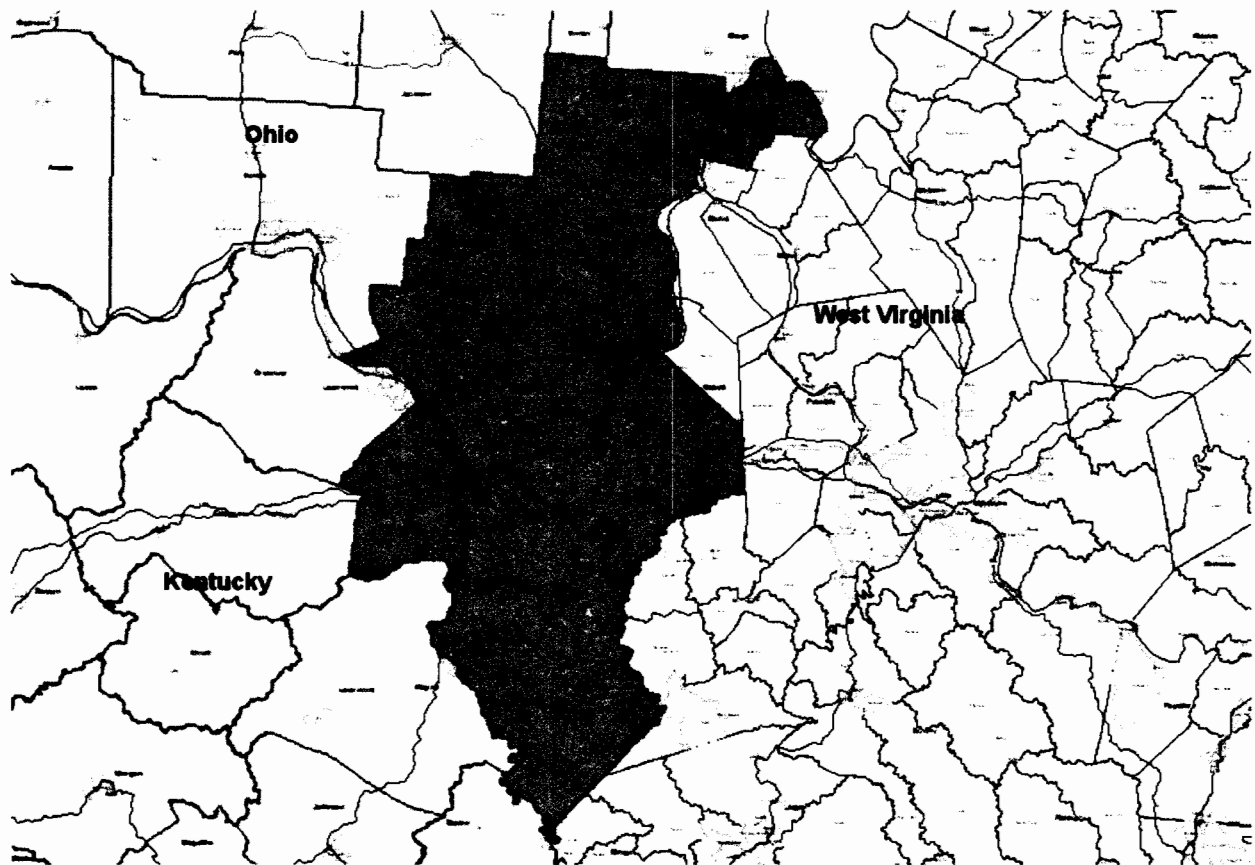


Figure 2 Nonattainment portions of Mason County and nearby areas shaded in orange

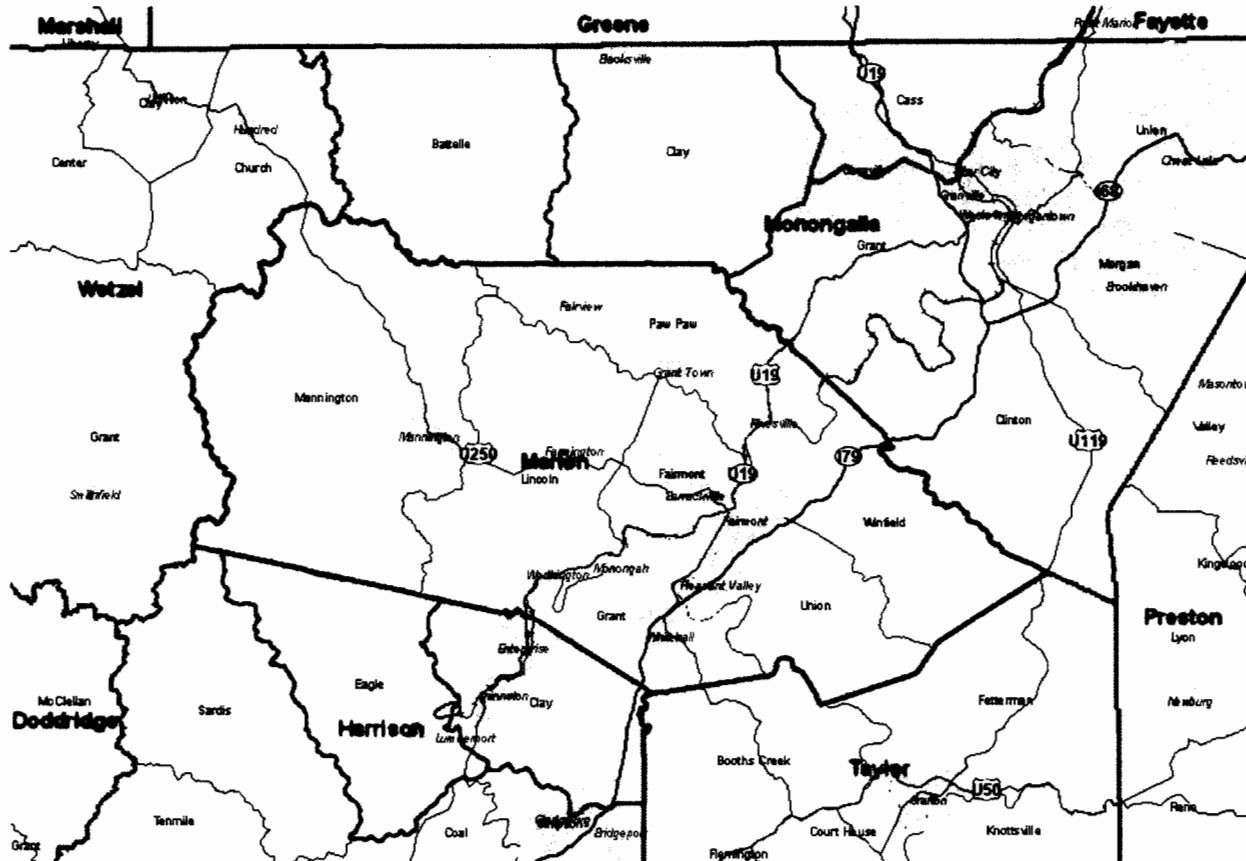


Figure 3 Nonattainment portions of Harrison, Marion & Monongalia Counties outlined in blue

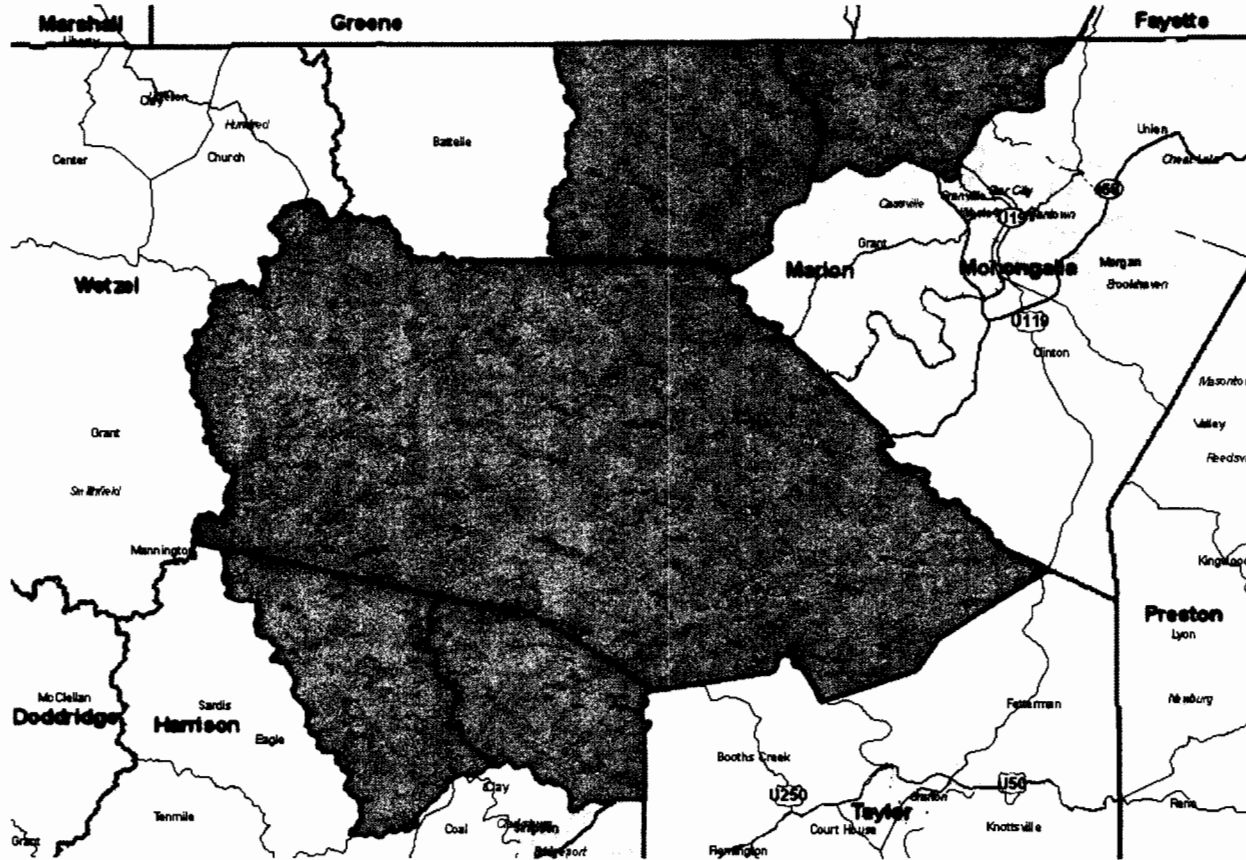


Figure 4 Nonattainment portions of Harrison, Marion and Mongalia Counties shaded orange

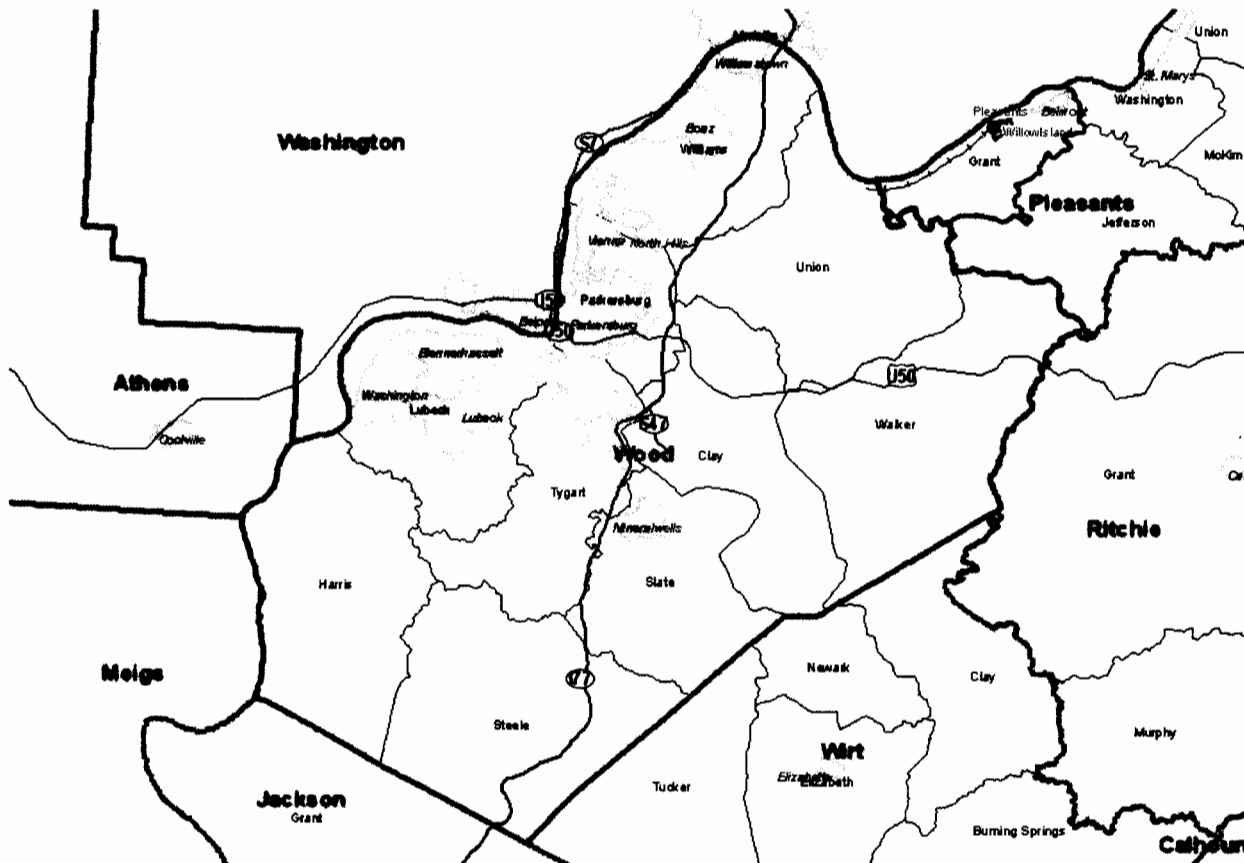


Figure 5 Wood County and nonattainment portions of Pleasants County outlined in blue

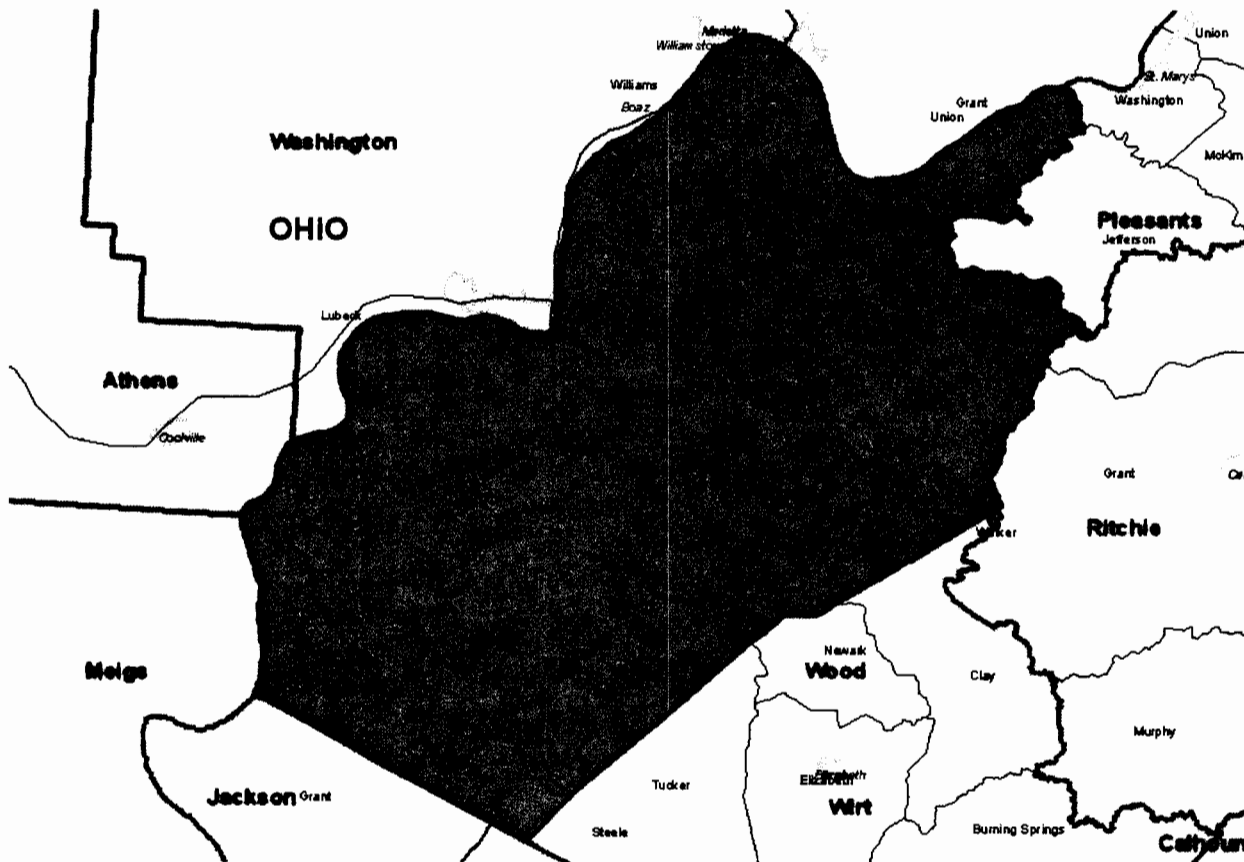


Figure 6 Wood County and Nonattainment portions of Pleasants County shaded orange