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Governor

State of New Hampshire

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December 18, 2007

Mr. Robert W. Varney
Regional Administrator
U.S. Environmental Protection Agency, Region I
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: Designation of Attainment Area Status under the Revised Fine Particle (PM_{2.5}) Standard

Dear Mr. Varney:

As required by the Clean Air Act and the Transportation Equity Act for the 21st Century, I hereby request that New Hampshire be designated as in attainment for the 24-hour and annual National Ambient Air Quality Standard (NAAQS) for ground level particles smaller than 2.5 microns in diameter (PM_{2.5}). All areas of New Hampshire currently attain the standard and there are no areas of the state that exacerbate PM_{2.5} violations in downwind nonattainment areas.

Protecting our air quality is of the utmost importance to me and to the citizens of New Hampshire. That is why we passed and I signed last year, HB 1673 a bill aimed at reducing mercury emissions from the state's coal-fired power plants. This law requires the installation of control equipment that will significantly reduce the state's emissions of small particles. New Hampshire also continues to implement the New Hampshire Clean Power Act, which reduces emissions of four important air pollutants. We are also moving toward cleaner fleets and continue to explore other ways to reduce fine particle pollutants in order to protect the well being of our citizens and our environment.

The U.S. Environmental Protection Agency (EPA) issued designation guidance in its memorandum from Robert J. Meyers to EPA Regional Administrators, dated June 8, 2007. Accordingly, my recommendations consider measurements of PM_{2.5} air pollution collected between 2004 and 2006. In addition, we considered more recent 2007 data to ensure the appropriateness of the proposed designations. In the past, the State of New Hampshire has questioned EPA's presumptive norm of using Consolidated Metropolitan Statistical Areas (CMSAs) for designation boundaries because there is a wealth of published research that demonstrates where such assumptions don't make sense, especially in New Hampshire's case. Fortunately, this issue does not arise in my current recommendations, but remains an issue for future boundary designations, specifically for the pending revised 8-hour ozone standard.

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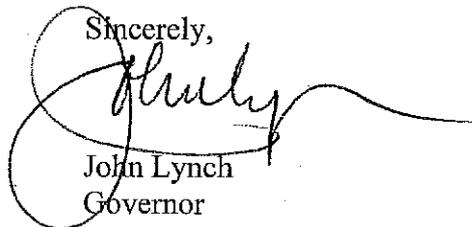
As demonstrated in the following tables, New Hampshire has reached state-wide attainment for both the annual and the revised 24-hour $PM_{2.5}$ NAAQS. Our three neighboring states (Maine, Massachusetts, and Vermont) are also monitoring $PM_{2.5}$ air pollution levels below the level of the standards, thus the emissions from New Hampshire are not contributing to $PM_{2.5}$ nonattainment in those states. No monitor within the State approaches the $PM_{2.5}$ NAAQS and there is very little variation of $PM_{2.5}$ concentrations across New Hampshire. This fact, along with accepted science applied to air pollution transport, suggests that $PM_{2.5}$ pollution concentrations in the State are largely driven by sources that lie outside of the New Hampshire, much as is the case for ozone. In fact, according to measurements collected in the Great Gulf area in the White Mountains, Lye Brook in Vermont, and Acadia National Park in Maine, around 50 percent of the $PM_{2.5}$ content on an annual basis in northern New England is composed of sulfate, a product mostly attributed to coal-burning power plants in upwind areas.

In summary, I propose that the entire State of New Hampshire be designated as in attainment for the 24-hour and annual $PM_{2.5}$ NAAQS, and kept separate from designated areas in neighboring states. With this designation, we recognize there is room for improvement and we expect to achieve that with our actions to address regional haze in the near future.

As New Hampshire continues to find ways to protect the health of its citizens by reducing air pollution emissions, I ask that EPA also continues to seek new ways to reduce air pollution from all type of sources on a national basis. As you know, New Hampshire is a "downwind state" that receives most of its air pollution from other portions of the nation. Long-term protection of our citizens and environmental resources will require a collective solution.

Thank you for your consideration of my recommendations. If you have any questions regarding this determination, please contact Thomas Burack, Commissioner of the Department of Environmental Services at (603) 271-3449.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lynch", is written over a circular stamp or seal. The signature is fluid and cursive.

John Lynch
Governor

cc: Thomas S. Burack, Commissioner DES
Robert R. Scott, Air Resources Director DES

TABLE 1. Estimated 2004 – 2006 24-Hour PM_{2.5} Design Values by Monitor, in micrograms per cubic meter (µg/m³)

Location	Monitor ID	2004 98 th Percentile	2005 98 th Percentile	2006 98 th Percentile	2007 98 th Percentile ¹	2004-2006 Design Value	2005-2007 Design Value ¹	PM _{2.5} NAAQS
Berlin	330070014	29	26	23	--	26	25 ²	35
Claremont	330190003	31	35	24	20	30	26	35
Haverhill	330090008	28	--	--	--	--	--	35
Lebanon	330090010	--	31	19	20	26 ³	23	35
Keene	330050007	30	29	32	24	30	28	35
Laconia	330012004	22	19	23	20	21	21	35
Manchester	330110020	28	27	24 ⁵	25 ⁵	26 ⁵	25 ⁵	35
Nashua	330111015 ⁴	27 ⁴	25	27	28	26 ⁴	27	35
Pembroke	330131006	29	24	25	27	26	25	35
Portsmouth	330150014	28	25	27	30	27	27	35

TABLE 2. Estimated 2004 – 2006 Annual PM_{2.5} Design Values by Monitor, in micrograms per cubic meter (µg/m³)

Location	Monitor ID	2004 Annual	2005 Annual	2006 Annual	2007 Annual ¹	2004-2006 Design Value	2005-2007 Design Value ¹	PM _{2.5} NAAQS
Berlin	330070014	10.8	10.6	8.8	--	10.1	9.7 ²	15
Claremont	330190003	9.2	10.8	9.1	8.9	9.7	9.6	15
Haverhill	330090008	7.6	--	--	--	--	--	15
Lebanon	330090010	--	9.2	8.2	7.8	8.3 ³	8.4	15
Keene	330050007	10.9	12.0	11.7	9.9	11.5	11.2	15
Laconia	330012004	7.1	7.8	7.4	7.1	7.4	7.4	15
Manchester	330110020	9.6	10.5	7.7 ⁵	7.9 ⁵	9.3 ⁵	8.7 ⁵	15
Nashua	330111015 ⁴	9.4 ⁴	10.5	9.3	9.8	9.7 ⁴	9.9	15
Pembroke	330131006	9.8	10.1	9.4	9.6	9.8	9.7	15
Portsmouth	330150014	9.0	9.0	8.9	8.9	9.0	8.9	15

TABLE 3. Proposed Designation of Areas of 24-Hour and Annual PM_{2.5} NAAQS Nonattainment in New Hampshire

¹ Data for 2007 is presented for illustrative purposes due to being based on preliminary data for the year through September. Final data has not yet been delivered in full from the testing laboratory.

² Estimated design value based on 2 years of data – provided for illustrative purposes only.

³ Estimated design value combines monitored data for Haverhill and Lebanon, which share the same airshed. Provided for illustrative purposes.

⁴ Nashua data for 2004 collected at 330111010. Remaining years collected at 330111015. 2004-2006 design value estimated by combining values for both sites.

⁵ Manchester 2006 and 2007 data is estimated based on TEOM measurements due to removal of FRM samplers. To date, continuous measurement techniques have not been approved by EPA as an equivalent method for PM_{2.5} measurements.

NEW HAMPSHIRE – PM_{2.5} (24-HOUR AND ANNUAL STANDARDS)

Designated Area	Designation	Classification
	Type	Type
New Hampshire: None	Nonattainment	--
All portions of all counties	Attainment	Attainment