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TTY USERS CALL VIA MD RELAY

December 17, 2007

Mr. Donald Welsh
Regional Administrator (3RA00)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia PA 19103-2023

Dear Mr. Welsh:

Maryland thanks you for the opportunity to present the Environmental Protection Agency (EPA) with recommendations for Maryland's Fine Particle nonattainment areas under the revised daily standard. In accordance with Section 107(d)(1) of the Clean Air Act, Maryland's boundary recommendations for attainment, nonattainment, and control region areas under the revised daily fine particle standard are provided in Table 1.

Clean air continues to be very important to the State of Maryland and its citizens. Maryland is currently preparing an air quality plan related to the annual fine particle standard. Significant progress has already been made in reducing fine particle pollution. The adoption of the Maryland Healthy Air Act, the region's most aggressive power plant control program, will further this progress by reducing Maryland's power plant emissions faster and more aggressively than the Federal Clean Air Interstate Rule.

Maryland continues to emphasize the need for tough, multi-state, regional control programs that not only reduce pollution close to home but also significantly reduce the amount of transported pollution from out-of-state sources. The Maryland Healthy Air Act and other aggressive regulations have put Maryland in the forefront on local pollution control. Transported pollution, however, represents a sizeable contribution to Maryland's fine particle problems. Pollution controls over most of the East will be needed for Maryland to attain the revised daily fine particle standard. Reducing transported pollution is not only important to protect the health of Maryland's citizens but it is also directly linked to Maryland's business climate and our ability to spur continued economic development through new infrastructure investment.

Maryland's recommendations are based upon three guiding principles that emerged from our discussions with stakeholders over the past ten years. These principles are:

1. Accountability - EPA must continue to hold upwind areas that contribute to poor air quality in downwind areas responsible for making appropriate reductions in emissions.
2. Maintaining Effective Planning Processes - Existing, effective air quality planning and transportation conformity processes like those in the Baltimore and Washington areas should be recognized and maintained whenever possible. Maryland works with several separate Metropolitan Planning Organizations in developing clean air and transportation plans. This has worked very well for certain Clean Air Act requirements, like transportation conformity, where air quality and transportation planning responsibilities overlap.
3. Consistency - EPA needs to ensure that a consistent national designation policy is used in this and all designation processes.

Table 1 summarizes the specific areas that Maryland is recommending as attainment or nonattainment. These recommendations are based upon the 2006 annual PM2.5 design values as shown in Map 4 of Attachment A. Maps 1, 2, and 3 of Attachment A illustrate the recommended PM fine nonattainment areas, PM2.5 monitor locations, and the 2006 annual PM2.5 design values.

TABLE 1

**Maryland's Designation Recommendations for EPA's
Revised Daily Fine Particle Standard**

<u>Designated Area</u>	<u>Designation</u>
<i>Baltimore Area</i>	
Anne Arundel County	Nonattainment
Baltimore City	Nonattainment
Baltimore County	Nonattainment
Carroll County	Nonattainment
Harford County	Nonattainment
Howard County	Nonattainment
<i>Washington DC Area</i>	
Charles County	Nonattainment
Frederick County	Nonattainment
Montgomery County	Nonattainment
Prince Georges County	Nonattainment

