



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

December 17, 2007

Mr. Donald S. Welsh
Regional Administrator
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Administrator Welsh:

The purpose of this letter is to formally respond on behalf of the Commonwealth of Virginia to the U.S. Environmental Protection Agency's (EPA's) request for area designations under the 2006 short term National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM_{2.5}). This newly promulgated standard requires compliance with the 35 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) standard over a 24-hour period. These designation recommendations are required under Section 107(d)(1) of the Clean Air Act (CAA).

As you know, a great deal of progress has already been made in reducing PM_{2.5} pollution due to both federal and state air pollution control programs. In fact, I am pleased to inform you that all the ambient monitoring sites for PM_{2.5} in Virginia are currently in compliance with the new 24-hour standard. A table with the most recent daily design values for calendar years 2004 to 2006 at these monitoring sites is presented in Enclosure I to this letter.

In light of these data, I strongly urge you to designate the entire Commonwealth as an attainment area for this standard. Beyond the current air quality attainment indicators, this request is further supported by the anticipated emission reductions and air quality improvements that will result from the pending federal Clear Air Interstate Rule (CAIR) and other programs.

Regarding the jurisdictions in Northern Virginia that are part of the Washington, D.C. Metropolitan Statistical Area (MSA), I offer the following additional supporting information for these jurisdictions to be designated as an

attainment area, despite a single isolated area of monitored nonattainment in the District of Columbia.

- All monitors in Northern Virginia are currently in compliance with both the annual and daily standard.
- Significant emission reductions in sulfur dioxide (SO₂) and oxides of nitrogen (NO_x) have been achieved in Northern Virginia since 2002. This reduction trend is expected to continue.
- Current PM_{2.5} modeling results predict that all monitors in the Washington MSA will be in compliance with the daily standard by 2009.

Additional data supporting the points made above are provided in Enclosure II. Finally, I would urge EPA to continue to monitor and consider the most recent monitoring data for this area up to the completion of the designation process.

Thank you for the opportunity to provide input on this very important air quality issue on behalf of the citizens of Virginia who are benefiting from our collective efforts to improve air quality.

Sincerely,

A handwritten signature in black ink that reads "David K. Paylor". The signature is written in a cursive style with a large, prominent "D" and "P".

David K. Paylor

Enclosures

Cc: L. Preston Bryant, Jr.
James Sydnor, DEQ