



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4020  
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December 13, 2013

Mr. Shawn M. Garvin  
Regional Administrator  
EPA Region III  
1650 Arch Street (3RA00)  
Philadelphia, PA 19103-2029

Dear Mr. Garvin:

Pursuant to Section 107(d)(1)(A) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I hereby submit the initial recommendations and comments on the designation of areas in Virginia under the 2012 Primary Annual National Ambient Air Quality Standard (NAAQS) for Fine Particle Matter (PM<sub>2.5</sub>). This letter is in direct response to the guidance provided in the April 16, 2013, EPA memorandum that outlines the data and analyses to be considered in making these area designation recommendations.

The Department of Environmental Quality (DEQ) operates an ambient PM<sub>2.5</sub> monitoring network in Virginia. The latest ambient concentrations observed by this monitoring network are well below the level of the new standard (see enclosure) and have significantly decreased since 2000. At the same time, emissions of PM<sub>2.5</sub> and related precursor pollutants have also decreased as a result of both state and federal control programs. We believe that these observed levels and trends are generally representative of the Commonwealth as a whole with regard to the pollution exposure and air quality improvement experienced by the general public. Therefore, I respectfully request that all of Virginia be designated attainment for the 2012 PM<sub>2.5</sub> standard.

As a side note, the air quality improvement noted above has enabled the Washington, D.C. area, which was the only previous PM<sub>2.5</sub> nonattainment area impacting Virginia, to come into compliance with the 1997 annual PM<sub>2.5</sub> standard. We look forward to EPA's action to approve the redesignation request that the three jurisdictions in the Washington area have submitted for the 1997 standard.

Thank you again for this opportunity to provide input on this important issue for Virginia. Please contact me if you have any questions concerning these recommendations.

Mr. Shawn Garvin  
December 13, 2013  
Page Two

Sincerely,

A handwritten signature in black ink, appearing to read "David K. Paylor". The signature is written in a cursive style with a large, prominent initial "D".

David K. Paylor

Enclosure

cc: Diana Esher, EPA RIII Air Protection Division Director (3AP00)  
Doug Domenech, Secretary of Natural Resources  
Michael Dowd, DEQ Air Quality Division Director

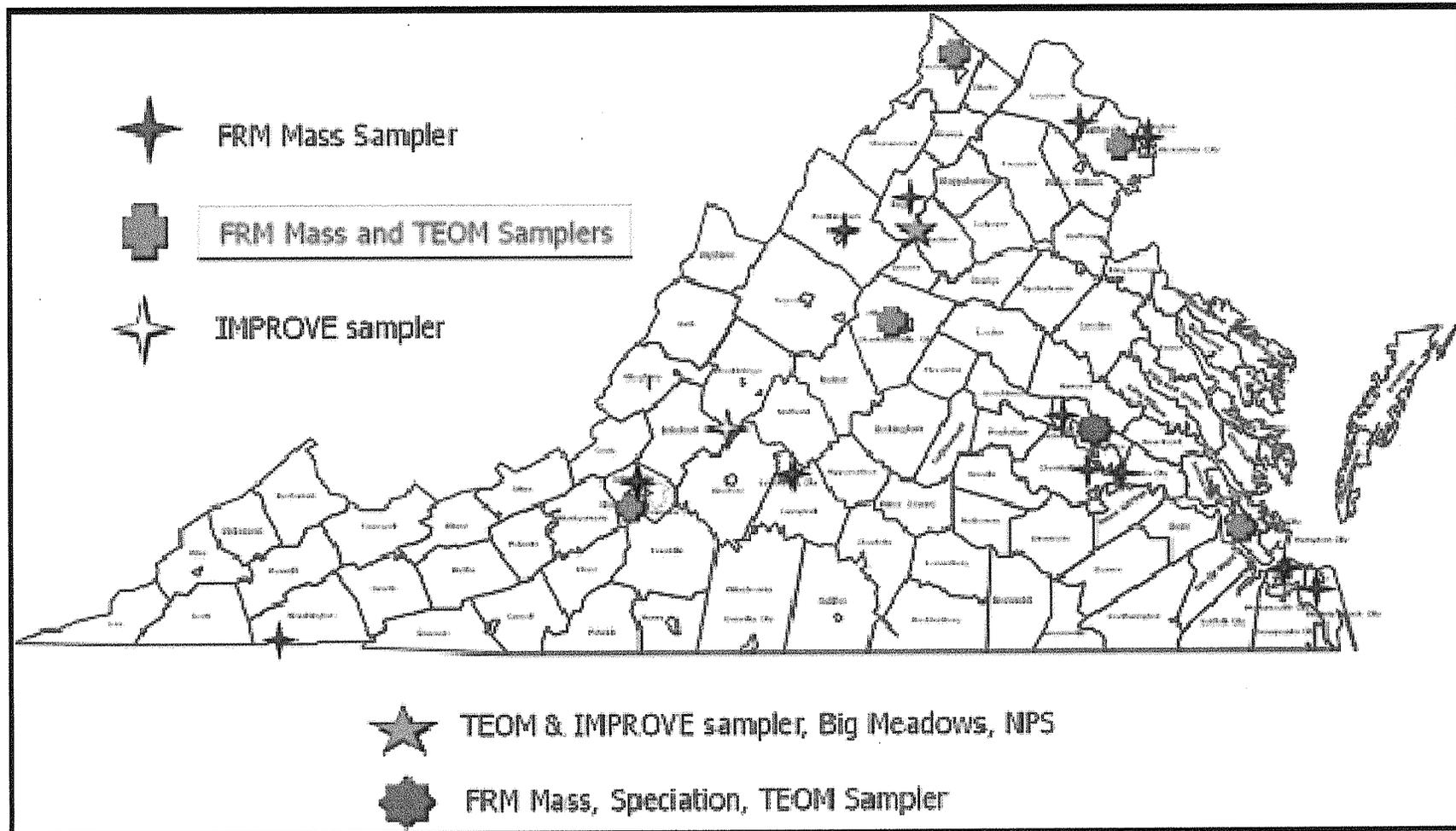
## Enclosure I

# Virginia PM<sub>2.5</sub> Air Quality and Emissions Data

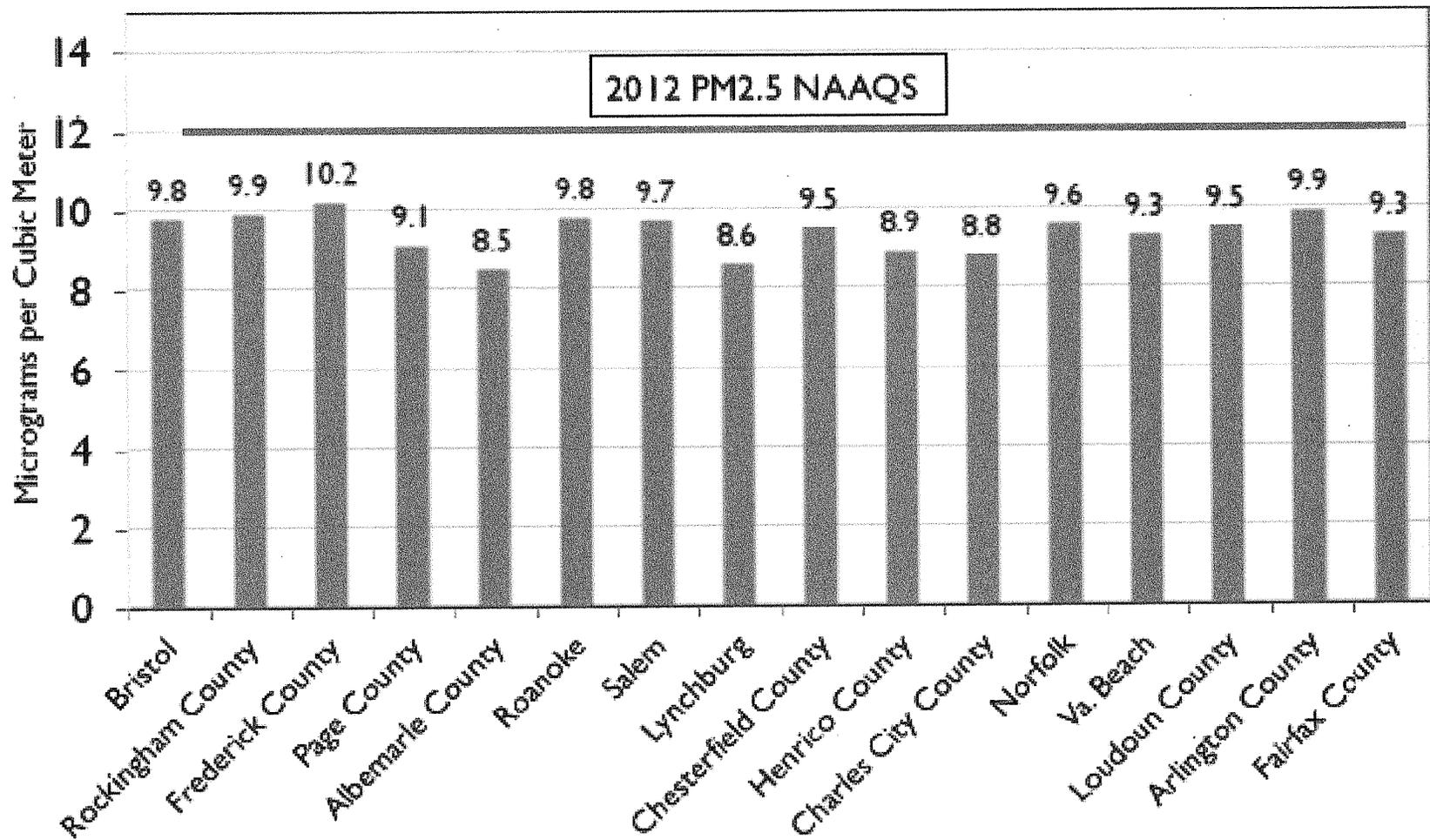
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- I. PM<sub>2.5</sub> Monitoring Network
- II. PM<sub>2.5</sub> Monitoring Data
- III. PM<sub>2.5</sub> Monitoring Data Trends
- IV. 2011 Statewide Emissions
- V. PM<sub>2.5</sub> Emissions Trends.

# PM<sub>2.5</sub> MONITORING NETWORK



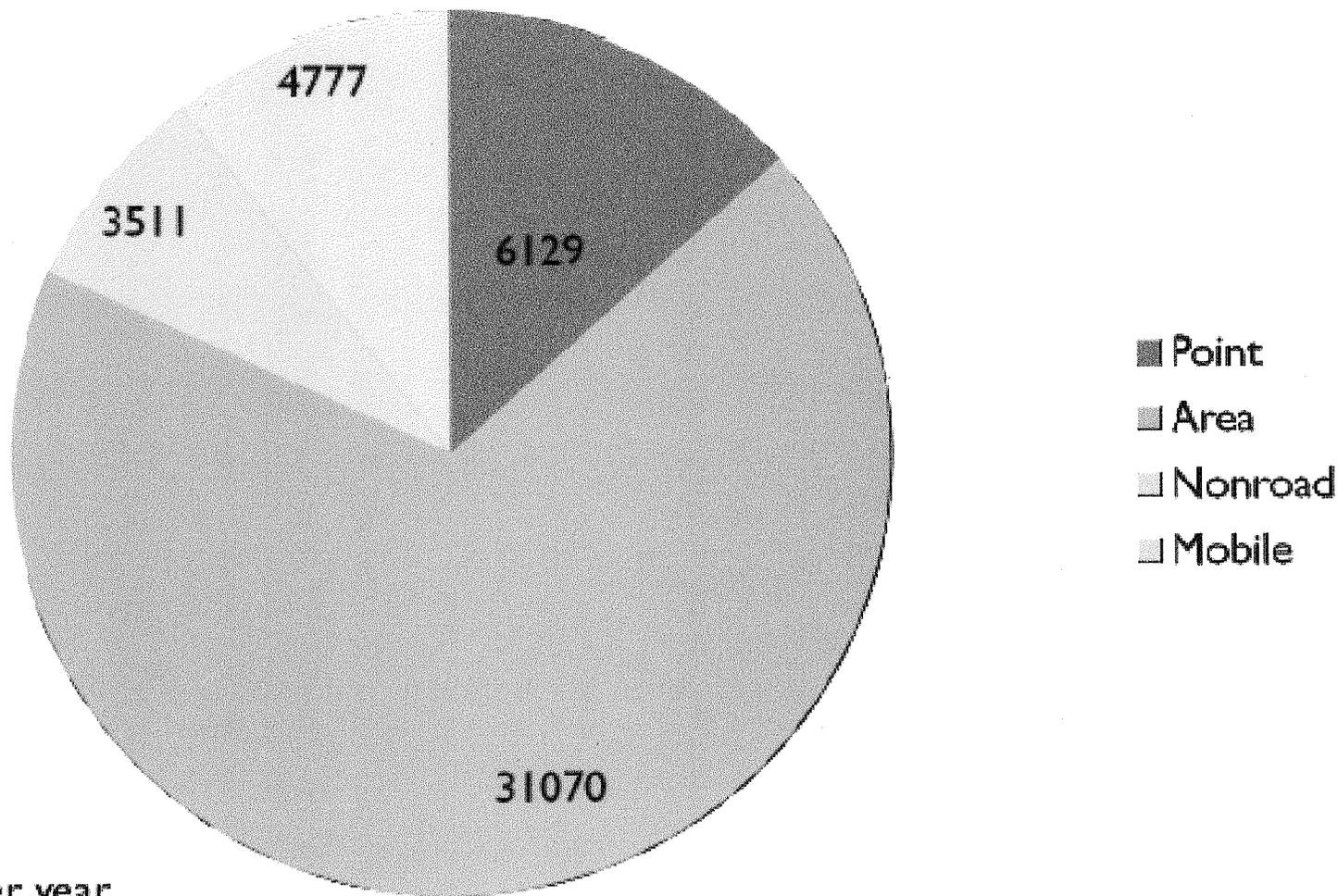
# PM<sub>2.5</sub> MONITORING DATA (2010-2012)





# Virginia Statewide 2011 PM<sub>2.5</sub> Emissions\*

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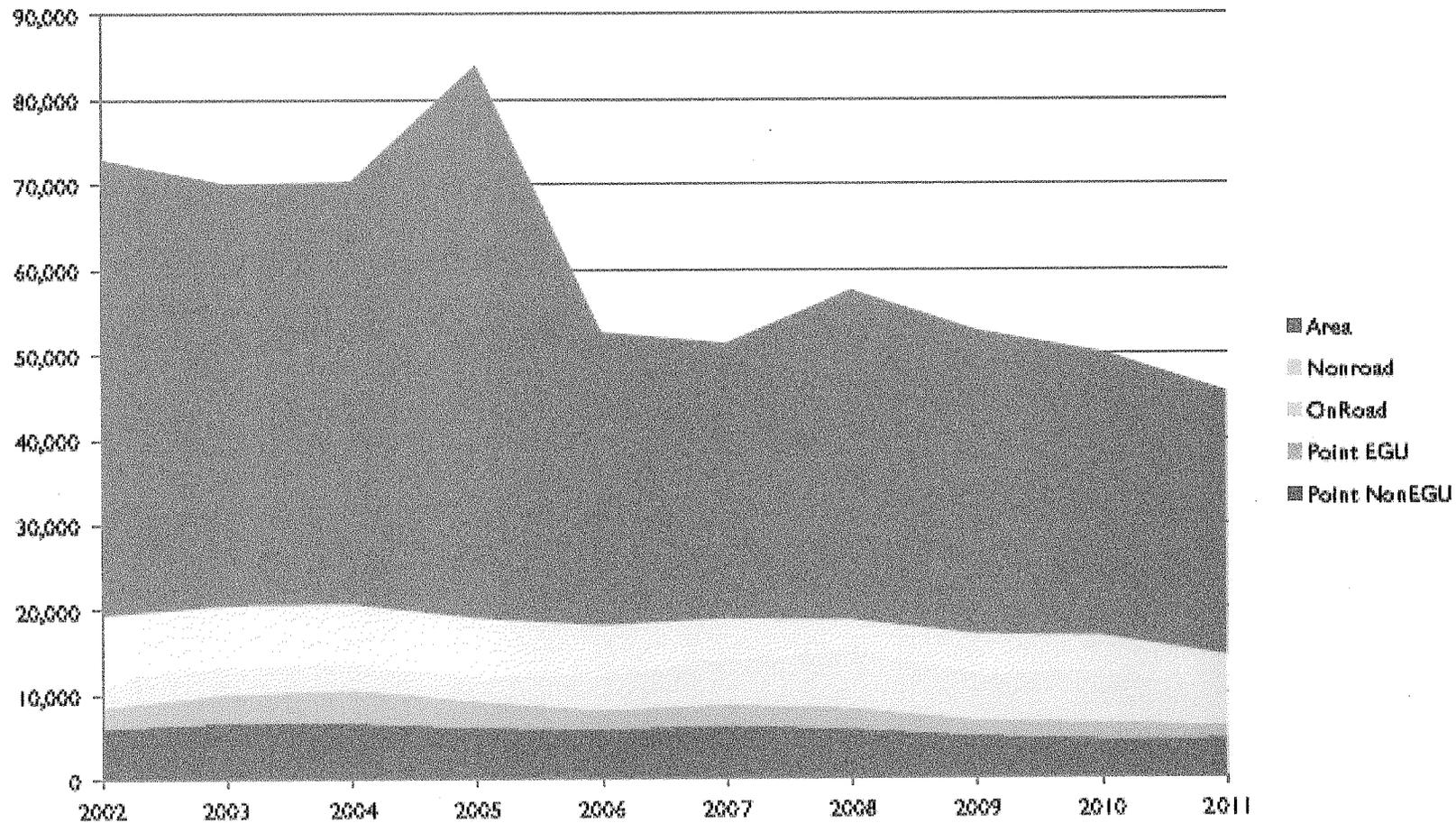


\* In tons per year

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# VA SO<sub>2</sub> EMISSIONS TRENDS



# Enclosure

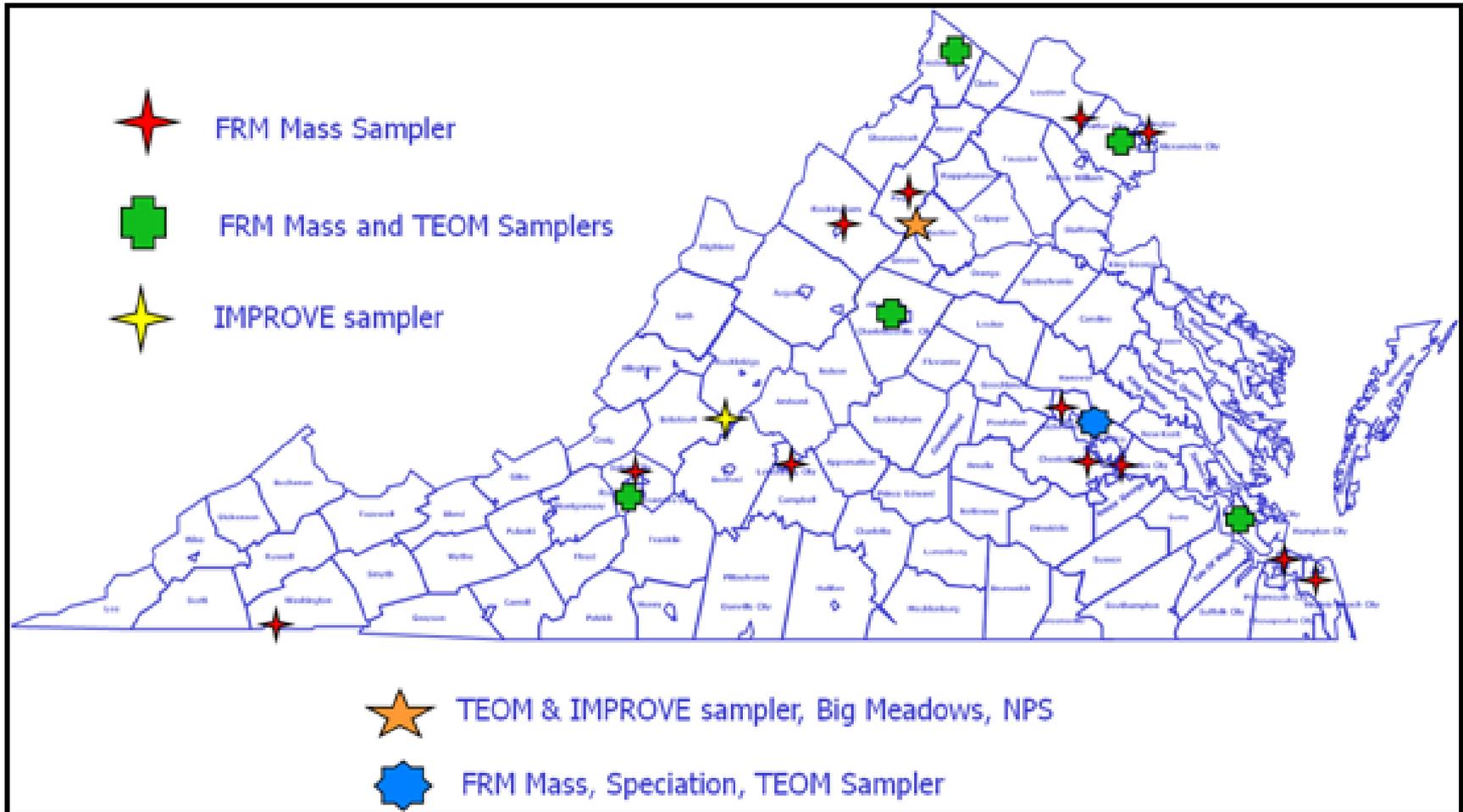
## Virginia PM<sub>2.5</sub> Air Quality and Emissions Data

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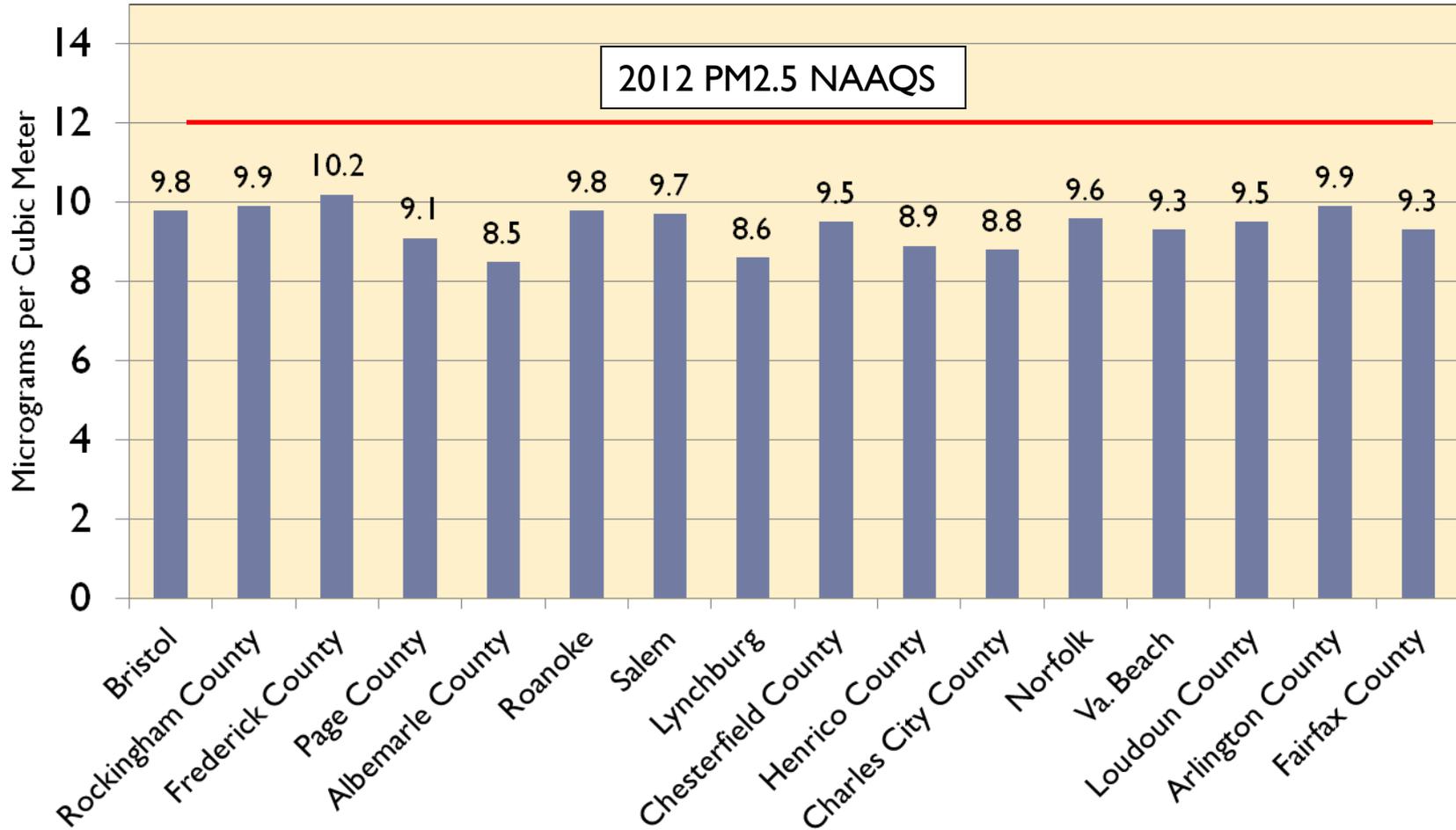
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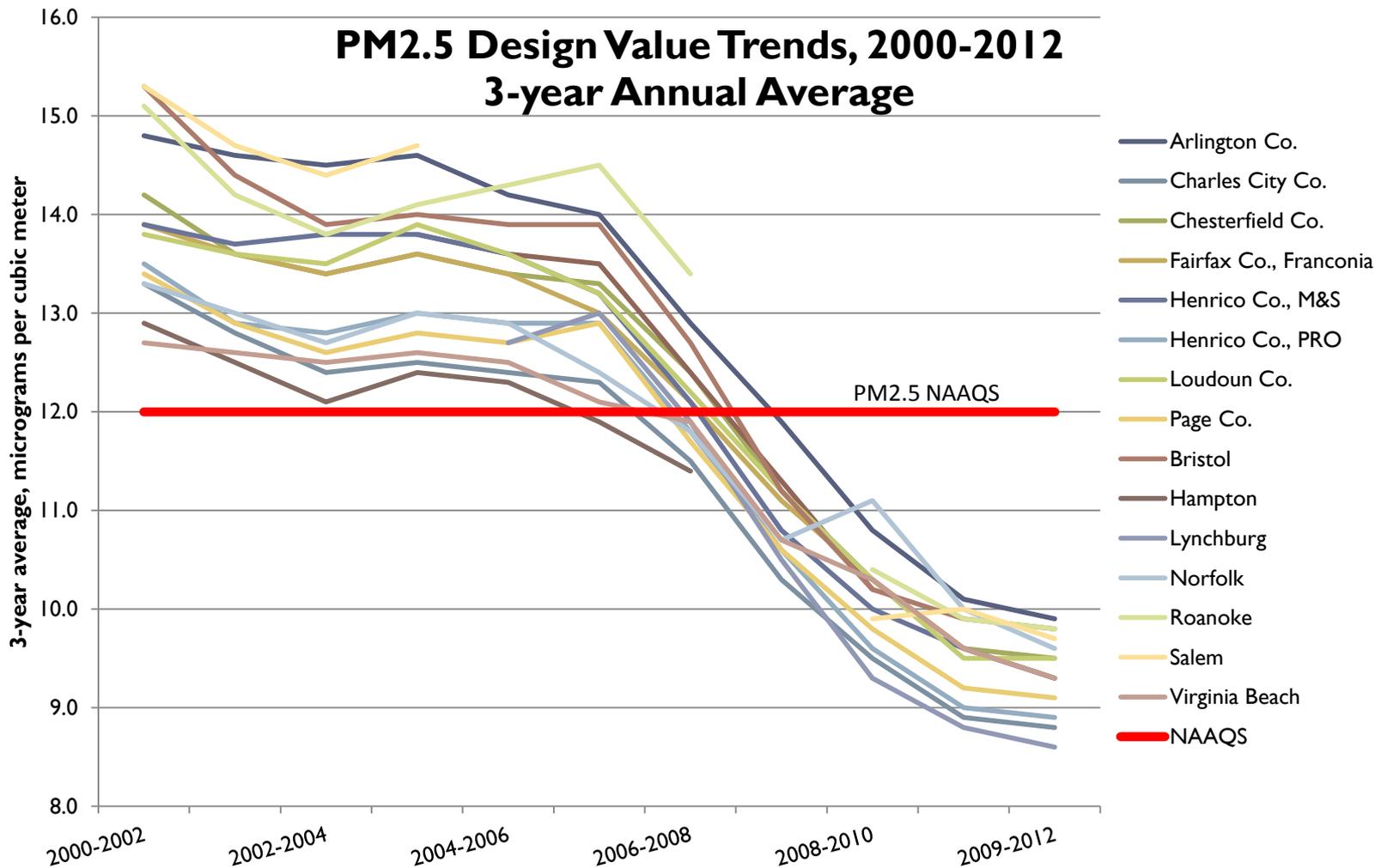
# PM<sub>2.5</sub> MONITORING NETWORK



# PM<sub>2.5</sub> MONITORING DATA (2010-2012)

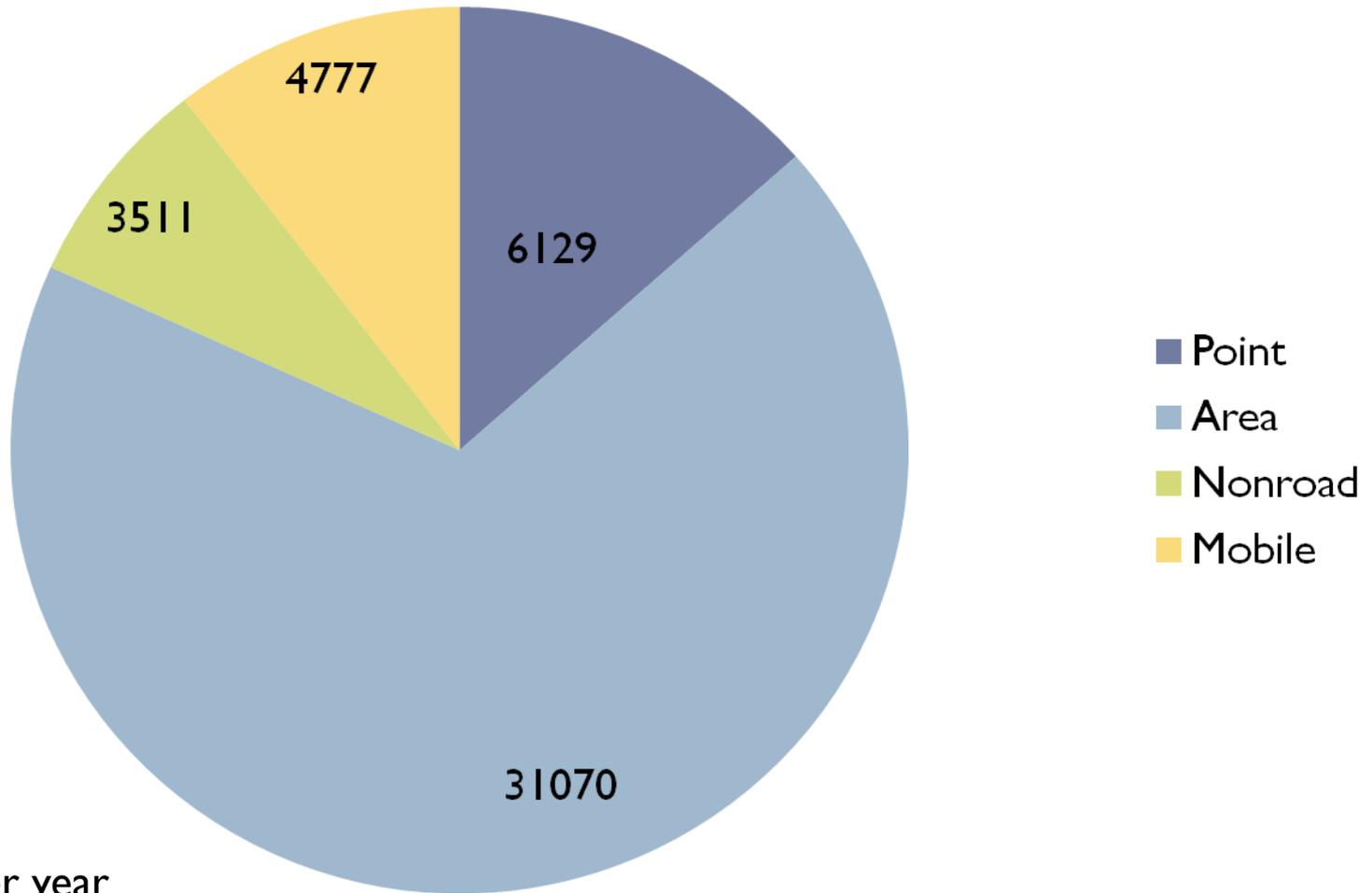


# PM<sub>2.5</sub> MONITORING DATA TRENDS



# Virginia Statewide 2011 PM<sub>2.5</sub> Emissions\*

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\* In tons per year

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# VA SO<sub>2</sub> EMISSIONS TRENDS

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