Subject: Requirements for Ambient Air Monitoring of Carbon Monoxide (CO) in Light of the

Completion of Twenty Years following Redesignation as a Maintenance Area

(Washington, DC-MD-VA CO Maintenance Area)

Dear ---:

The Washington, DC-MD-VA 1971 carbon monoxide (CO) national ambient air quality standard (NAAQS) nonattainment area was redesignated as a maintenance area effective March 15, 1996 (61 FR 2931) following the approval of the area's redesignation request and maintenance plan, which was submitted in October 1995. In accordance with the CAA Section 175A(b), the area submitted its second maintenance plan in March 2004, which demonstrated the maintenance with the above NAAQS until March 16, 2016. The second maintenance plan was approved effective June 3, 2005 (70 FR 16958). On March 16, 2016, the Washington, DC-MD-VA 1971 CO NAAQS maintenance area will complete the requirements to demonstrate maintenance of the CO NAAQS for twenty years after its redesignation as a maintenance area on March 15, 1996.

In light of the above facts, going forward, would the Washington, DC-MD-VA area be required to maintain as many as eight CO monitors, as mapped in the maintenance plan that concluded on March 16, 2016 (see Section 2.3), or at least the number of monitors in place as of March 16, 2016? Or, is it permissible to reduce the number of monitors in the region to one or two, in accordance with the most up-to-date CO monitoring network design criteria stipulated in Appendix D of 40 C.F.R. Part 58 (see Section 4.2)? Our understanding is that the design criteria in Appendix D outlines the most current requirements, which are based on the rule that retained the primary CO NAAQS and became effective on October 31, 2011 (76 FR 54294).

Thank you for the clarification,

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