

**American Lung Association • Earthjustice
Environmental Defense Fund
Natural Resources Defense Council**

October 2, 2008

Ms. Jenny Noonan Edwards
Acting Director
Office of Air Quality Planning and Standards
Office of Air and Radiation
U. S. Environmental Protection Agency
Research Triangle Park, NC 27711

Re: EPA-HQ-OAR-2007-0562, Federal Register Vol. 73, No. 170, September 2, 2008.
Attainment/nonattainment designations for PM_{2.5} National Ambient Air Quality Standards

Dear Ms. Edwards:

The American Lung Association, Earthjustice, the Environmental Defense Fund and the Natural Resources Defense Council appreciate the opportunity to comment on the U. S. Environmental Protection Agency's proposed designations for attainment or nonattainment of the PM_{2.5} National Ambient Air Quality Standards based on your reported 2005-2007 design values. We have attached a list of areas that fail to attain the PM_{2.5} standards. In addition, we have additional comments on the Agency's proposals.

EPA must designate all areas violating the annual standard.

All areas that fail to attain the annual or the 24-hour standard should be designated. Although the Federal Register notice states that these designations are for the PM_{2.5} 24-hour standard, there are many areas that fail to attain the annual standard. We note that your notifications to the states¹ completely failed to discuss the areas that failed to attain the annual standard. Seven areas newly violating the annual standard were completely ignored, despite their 2005-2007 monitoring data that clearly identifies their violation. One of them, Houston-Baytown-Huntsville, TX Combined Statistical Area, has over 5.7 million residents and is the nation's fourth largest city.

Unless the U.S. Environmental Protection Agency officially recognizes the failure of these areas to attain the annual standard, the people who live in those areas will fail to receive the full protection under the Clean Air Act to which they are entitled. Those protections include

¹ U.S. Environmental Protection Agency. *Area Designations for the 24-Hour Fine Particle (PM_{2.5}) Standards*. Posted at <http://www.epa.gov/pmdesignations/2006standards/regs.htm#1>.

provisions such as attainment and progress plans, New Source Review, reasonably available control technology for existing sources, contingency measures, and other requirements mandated by Congress to protect them from increasing the burden of air pollution in their communities. EPA is legally obligated to enforce the law and provide that protection. Hundreds of thousands will suffer and many will die because the measures to clean up pollution will not be put in place.

The nation has been down this road too many times before. The Clean Air Act requires the EPA to designate nonattainment areas because Congress recognized the need for official recognition of the levels of unhealthy air quality and accountability for reducing those levels. This is not a voluntary program, but one where there is formal, affirmative responsibility for action.

The Act triggers the EPA's duty to promulgate designations upon revision of any NAAQS. Congress directed that such designations must provide for designation as "nonattainment" any area that does not meet the national primary or secondary NAAQS for the pollutant, necessarily including any annual standard for the pollutant. 42 U.S.C. 7407(d)(1). EPA's 2006 revision of the PM_{2.5} NAAQS included revision of the annual standard. Among other things, EPA revised the spatial averaging component of the annual standard. Having revised the annual standard, EPA is obligated under section 107 of the Act to promulgate designations for the revised standard.

EPA's proposed designations to the states provide no explanation of EPA's failure to include designations for violations of the annual standard, and no defensible explanation exists. Agency staff has informally suggested that no designations are required for the annual standard because the 2006 revision did not change the "level" of the standard. But the Act does not limit EPA's designations duty to situations in which the "level" of the standard is changed. Rather, EPA must promulgate designations for any revised standard, without regard to the nature of the revision. Such a conclusion is compelled by the plain language of section 107.

EPA's refusal to make nonattainment designations for the annual standard is also manifestly arbitrary and unreasonable. Congress plainly intended that areas violating the NAAQS be designated nonattainment and subjected to the range of protections set forth in part D. There is no rational and legal basis for EPA to deprive residents of these areas of the protections mandated by Congress. The Act's deadlines for designations, SIP revision, adoption of specific controls, and timely attainment all show that Congress viewed timely attainment of standards as an urgent matter requiring strong measures and expeditious action. It is illegal and wholly irrational for EPA to provide less protection to people breathing unhealthy annual PM_{2.5} levels today than to those breathing unhealthy annual levels several years ago when EPA promulgated nonattainment designations for the 1997 PM_{2.5} NAAQS – especially given the scientific evidence showing that PM_{2.5} is even more dangerous than previously thought. Yet that is precisely the result of EPA's proposed approach. An area with an annual PM_{2.5} design value of 15.2 µg/m³ at the time of the previous designations is designated "nonattainment", while an area with an even higher annual design value today (e.g., 15.8 µg/m³ in Houston) is treated as being "attainment" or "unclassifiable." There is no conceivable reasoned justification for such an outcome.

EPA must include all counties contributing to or monitoring violations in the nonattainment areas.

First, to explain the rationale for these recommendations, we refer to Section 107 of the Clean Air Act, which defines a nonattainment area as:

“any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant.”

Both local sources and transported emissions contribute to the burden of PM_{2.5} pollution in these states. Unless all these sources are included in the nonattainment area and made subject to planning and clean up requirements, these states will struggle to be able to protect public health. The states will need all the opportunities and authority available to them under the Clean Air Act to meet the standard by the required deadlines.

At a minimum, in any county that has a design value that fails to meet the standard, the entire county must be designated as nonattainment. To identify all areas that contribute to the ambient air quality in that county, we strongly believe that the EPA must include all the counties within any metropolitan statistical area and the combined statistical area that includes any county with the nonattainment designation. Congress itself endorsed this approach in the 1990 CAA Amendments.

The U.S. Census Bureau describes the general concept of a metropolitan statistical area as “that of a core area containing a substantial population nucleus, together with adjacent communities having a high degree of economic and social integration with that core.” Their definition includes urban areas and the communities around them that “meet specified requirements of commuting to or from the central counties”² The White House Office of Management and Budget (OMB) described the metropolitan area in its 2000 update as:

“an area containing a recognized population nucleus and adjacent communities that have a high degree of integration with that nucleus.”³

OMB was quite clear that metropolitan areas define robust economic and transportation connections, as represented by commuting patterns. Commuting patterns in metropolitan areas represent a minimum of 25 percent of the residents in outlying counties who work in the core county or residents of the core county hold 25 percent of the jobs in the outlying counties. OMB even increased these thresholds from the 15 percent as it was in the 1990s to recognize the increased inter-county economic connectivity in the United States.⁴

The jobs that create and sustain these commutes are likely themselves to be sources of emissions, as are the services that meet the needs of the companies and populations. Stationary sources,

² U.S. Census Bureau. “About Metropolitan and Micropolitan Statistical Areas.” Downloaded from <http://www.census.gov/population/www/estimates/aboutmetro.html>.

³ Federal Register, Vol. 65, 249: 82228-82238.

⁴ Federal Register, Vol. 65, 249: 82233.

such as industry, and mobile sources, including trucks and heavy equipment, are sources of emissions that connect directly to this economic nexus. Furthermore, commuting cars, trucks, buses and trains produce PM_{2.5} emissions.

Clearly, the economic and transportation integration that defines a metropolitan area makes it essential that the entire metropolitan area be included in the nonattainment area if the area is to reduce PM_{2.5} levels successfully. Only by including all these sources will the states succeed in meeting the standard.

For these reasons, the attached list of counties and other political subdivisions of each metropolitan area or combined statistical area follows the characterization of these areas contained in the White House Office of Management and Budget Bulletin NO. 08-01, *Update of Statistical Area Definitions and Guidance on their Uses*, November 20, 2007.

Pittsburgh-New Castle, PA Combined SA should be one nonattainment area.

In particular, we strenuously disagree with the previous designation of Allegheny County, Pennsylvania into two separate nonattainment areas, the “Liberty-Clairton” and “Pittsburgh-Beaver Valley.” The entire metropolitan area is cohesively defined for transportation and regional planning purposes as well as economic development, and should be so for air pollution control measures as well.

In no other county in the nation is a circle drawn entirely within the county for the purposes of creating a separate nonattainment area. Higher monitor readings in one part of the nonattainment area from that of other monitors simply indicates the presence of a major source of pollution in the vicinity. The fact that a large single source exists in that area should argue for a larger, not a smaller nonattainment area, since the emissions from that large source are likely blown throughout the entire Pittsburgh metropolitan region, into multiple states as well as across the international border. Indeed, previous studies of large sources of particulates throughout the Eastern U.S. demonstrate the widespread impact of the emissions from such large sources.⁵ The nonattainment designation should reflect the entire Pittsburgh-New Castle, PA Combined Statistical Area, including all of Allegheny County, as one area.

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area must be included as a nonattainment area

The EPA’s proposal to exclude the metropolitan Washington, DC area from any area designated nonattainment for the 2006 PM_{2.5} standards is unlawful and arbitrary for several reasons.

⁵ As examples, two publications that discuss some of the evidence for the impact of particulates on wide-geographic areas are these: Abt Associates. *The Particulate-Related Health Benefits of Reducing Power Plant Emissions*. For the Clean Air Task Force. October 2000; and Malm WC. *Introduction to Visibility*. National Park Service Visibility Program, Colorado State University, 1999.

First, according to EPA's AirData database, a monitor in Prince Georges County, Maryland, is violating the 24-hour PM_{2.5} standard based on 2005-2007 data. The tables for AirData showing this are attached in this submittal. The table shows the following 24-hour 98th percentile values at the Prince Georges Equestrian Center monitor 2:

2005 – 37 µg/m³
2006 – 36 µg/m³
2007 – 48 µg/m³

The three-year average of these values is well in excess of 35 µg/m³, thus showing a violation. EPA's response to Maryland's proposed designations (which proposed to designate the Washington metro area, including Prince Georges County, as nonattainment) does not address these data at all. If EPA is going to claim that these data are somehow flawed or not worthy of consideration, the agency must provide public notice of such a claim and provide an opportunity for comment. As the evidence stands now, the monitor shows a violation. The Act, therefore, requires EPA to designate the area as "nonattainment." A nonattainment designation is further warranted based on the consistently high 24-hour levels recorded at this monitor and the fact that the area was indisputably in violation in 2004-2006.

Designation of the Washington area as nonattainment is further supported by data in the District of Columbia. Data in the AirData database shows consistently high 24-hour PM_{2.5} levels at the two monitors at 34th and Dix NE. These data are also attached. Taking the higher of the values at the 2 monitors in each year, the site is in violation for 2005-2007. The site was also in violation based on 2004-2006 data, prompting the District to recommend the area be designated nonattainment.

Given that the Washington area is in fact violating the PM_{2.5} NAAQS and is consistently recording elevated PM_{2.5} levels, EPA must designate the entire metropolitan area as nonattainment. We incorporate by reference EPA's decision and rationale for designating the Washington metropolitan area nonattainment for the 1997 PM_{2.5} NAAQS. That rationale explains why the entire metro area, including the District and the Maryland and Virginia Counties in the current PM_{2.5} nonattainment area, must be included in the nonattainment area.

Even if the Washington area were not itself violating the 2006 NAAQS, EPA would have to designate the area nonattainment as part of a greater Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area nonattainment area. As explained earlier, Congress intended that nonattainment areas encompass the entirety of combined statistical urban areas. Here, the relevant combined statistical area is the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area. Since EPA agrees that the Baltimore area is in violation of the NAAQS, then even if the Washington area was not presently in violation of the standards, the entire CSA would have to be designated nonattainment.

This result is further compelled by the Act's mandate that EPA designate as "nonattainment" any area "that contributes to ambient air quality in a nearby area that does not meet" the NAAQS. Here, EPA's own data and analysis show that the Washington area unquestionably contributes in

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a substantial way to PM_{2.5} levels in the Baltimore area. The Washington area generates substantial emissions of PM_{2.5} and precursors. EPA's own analysis shows that regional wind patterns are often southwest to northeast. EPA's own data indicate that PM_{2.5} emissions in both Montgomery and Prince Georges Counties are higher than in any county in the proposed Baltimore nonattainment area.

Likewise, these two counties combined emit more sulfur dioxide (SO₂) than any county in the proposed Baltimore area, and collectively, the Maryland counties currently in the Washington nonattainment area emit about as much PM_{2.5} as all the counties in the proposed Baltimore area combined, and far more SO₂. Given the overwhelming evidence, EPA has no rational basis for concluding that the Washington area does not contribute to air quality that does not meet the NAAQS in the Baltimore area.

EPA must designate as nonattainment the counties on the attached list

The American Lung Association, the Environmental Defense Fund, Earthjustice and the Natural Resources Defense Council strongly recommend the counties in the attached list be designated nonattainment for PM_{2.5}, based on 2005-2007 design values (where adequate data is available) in either the county or the metropolitan areas that includes these counties.

Where adequate data are not available for 2005-07, EPA must base nonattainment designations on the most recent 3-year period for which valid data are available. For example, an area with incomplete data for 2005-2007 must be designated nonattainment if its 2004-06 data show a violation. Unfortunately, EPA is apparently taking the position that such an area should be designated "unclassifiable." That is truly indefensible where there are adequate data to show a violation in 2003-2005 or 2004-2006 – periods immediately preceding EPA's promulgation of the new NAAQS.

We look to the U.S. Environmental Protection Agency publishing these appropriate designations so that the important work to clean up the air we breathe can move forward.

Sincerely,

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CC: Robert J. Meyers Principal Deputy Assistant Administrator for Air and Radiation
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Attachments included here:

Recommended Nonattainment Areas for the PM_{2.5} National Ambient Air Quality Standards

Attached as separate PDFs:

EPA Airdata for the District of Columbia 2004, 2005, 2006, 2007

EPA Airdata for Prince George's County, MD 2004, 2005, 2006, 2007

Recommended Nonattainment Areas for the PM_{2.5} National Ambient Air Quality Standards

Based on 2005-2007 Design Values, listed by State and by Area ⁶

Alabama

Atlanta-Sandy Springs-Gainesville, GA-AL Combined Statistical Area
Chambers County

Birmingham-Hoover-Cullman, AL Combined Statistical Area
Bibb County
Blount County
Chilton County
Cullman County
Jefferson County
St. Clair County
Shelby County
Walker County

Columbus-Auburn-Opelika, GA-AL Combined Statistical Area
Lee County
Macon County
Russell County

Gadsden, AL MSA
Etowah County

Alaska

Fairbanks, AK MSA
Fairbanks North Star Borough
Juneau, AK MSA
Juneau City and Borough

Arizona

Nogales MSA
Santa Cruz County

⁶ Some areas include counties in more than one state. The list of counties and other political subdivisions of each metropolitan area or combined statistical area follows the characterization of these areas contained in the White House Office of Management and Budget Bulletin NO. 08-01, *Update of Statistical Area Definitions and Guidance on their Uses*, November 20, 2007.

California

Chico, CA MSA

Butte County

El Centro, CA MSA

Imperial County

Los Angeles-Long Beach-Riverside, CA Combined Statistical Area

Los Angeles County

Orange County

Riverside County

San Bernardino County

Ventura County

Sacramento-Arden-Arcade-Yuba City, CA-NV Combined Statistical Area

El Dorado County

Placer County

Sacramento County

Yolo County

Nevada County

Sutter County

Yuba County

San Jose-San Francisco-Oakland, CA Combined Statistical Area

Alameda County

Contra Costa County

Marin County

Napa County

San Benito County

San Francisco County

San Mateo County

Santa Clara County

Santa Cruz County

Solano County

Sonoma County

Bakersfield, CA MSA

Kern County

Fresno, CA MSA

Fresno County

Madera, CA MSA

Madera County

Modesto, CA MSA
Stanislaus County

Stockton, CA MSA
San Joaquin County

Visalia-Porterville, CA MSA
Tulare County

Hanford-Corcoran, CA MSA
Kings County

Merced, CA MSA
Merced County

Connecticut

New York - Newark-Bridgeport, NY-NJ-PA-CT Combined Statistical Area
Fairfield County
New Haven County
Litchfield County

Delaware

Philadelphia-Camden-Vineland, PA-NJ-DE-MD Combined SA
New Castle County

District of Columbia

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area
District of Columbia

Georgia

Atlanta-Sandy Springs-Gainesville, GA-AL Combined Statistical Area
Barrow County
Bartow County
Butts County
Carroll County
Cherokee County
Clayton County
Cobb County
Coweta County
Dawson County
DeKalb County
Douglas County

Fayette County
Forsyth County
Fulton County
Gwinnett County
Hall County
Haralson County
Heard County
Henry County
Jasper County
Lamar County
Meriwether County
Newton County
Paulding County
Pickens County
Pike County
Polk County
Rockdale County
Spalding County
Troup County
Upton County
Walton County

Augusta-Richmond County, GA-SC MSA

Burke County
Columbia County
McDuffie County
Richmond County

Chattanooga TN-GA MSA

Catoosa County
Dade County
Walker County

Columbus, GA-AL MSA

Chattahoochee County
Harris County
Marion County
Muscogee County

Irwinton, GA

Wilkinson County

Macon-Warner Robbins-Fort Valley, GA, Combined Statistical Area

Bibb County
Crawford County

Houston County
Jones County
Monroe County
Peach County
Twiggs County

Rome, GA MSA
Floyd County

Sandersville, GA
Washington County

Idaho

Logan, UT-ID MSA
Franklin County
Pinehurst
Shoshone County

Illinois

Chicago-Naperville-Michigan City, IL-IN-WI Combined Statistical Area
Cook County
DeKalb County
DuPage County
Grundy County
Kane County
Kankakee County
Kendall County
McHenry County
Will County
Lake County

Davenport-Moline-Rock Island, IA-IL MSA
Henry County
Mercer County
Rock Island County

Paducah, KY-IL MSA
Massac County

St. Louis-St. Charles-Farmington, MO-IL Combined Statistical Area
Bond County
Calhoun County
Clinton County
Jersey County

Macoupin County
Madison County
Monroe County
Randolph County
St. Clair County

Indiana

Chicago-Naperville-Michigan City, IL-IN-WI Combined Statistical Area

Jasper County
Lake County
LaPorte County
Newton County
Porter County

Cincinnati-Middletown-Wilmington, OH-KY-IN Combined Statistical Area

Clinton County
Dearborn County
Franklin County
Ohio County

Evansville, IN MSA

DuBois County
Gibson County
Pike County
Posey County
Spencer County
Vanderburgh County
Warrick County

Indianapolis-Anderson-Columbus, IN Combined Statistical Area

Bartholomew County
Boone County
Brown County
Hamilton County
Hancock County
Hendricks County
Henry County
Jennings County
Johnson County
Madison County
Marion County
Montgomery County
Morgan County
Putnam County
Shelby County

Lafayette-Frankfort, IN MSA

Benton County

Carroll County

Clinton County

Tippecanoe County

Louisville/Jefferson County-Elizabethtown-Scottsburg, KY-IN Combined Statistical Area

Clark County

Floyd County

Harrison County

Scott County

Washington County

Vincennes, IN MSA

Knox County

Iowa

Davenport-Moline-Rock Island, IA-IL MSA

Scott County

Muscatine, IA MSA

Louisa County

Muscatine County

Kentucky

Cincinnati-Middletown-Wilmington, OH-KY-IN Combined Statistical Area

Boone County

Bracken County

Campbell County

Gallatin County

Grant County

Kenton County

Pendleton County

Clarksville, TN-KY MSA

Christian County

Muhlenberg County

Trigg County

Evansville, IN MSA

Henderson County

Webster County

Huntington-Ashland, WV-KY-OH MSA

Boyd County
Greenup County
Lawrence County

Louisville/Jefferson County-Elizabethtown-Scottsburg, KY-IN Combined Statistical Area

Bullitt County
Hardin County
Henry County
Jefferson County
Larue County
Meade County
Nelson County
Oldham County
Shelby County
Spencer County
Trimble County

Paducah-Mayfield, KY-IL Combined Statistical Area

Ballard County
Graves County
Livingston County
McCracken County

Maryland

Hagerstown Martinsburg, MD-WV Metropolitan Statistical Area

Washington County

Philadelphia-Camden-Vineland, PA-NJ-DE-MD Combined Statistical Area

Cecil County

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area

Anne Arundel County
Baltimore County
Baltimore City
Calvert County
Carroll County
Charles County
Frederick County
Harford County
Howard County
Montgomery County
Prince George's County
Queen Anne's County
St. Mary's County

Michigan

Detroit-Warren-Flint, MI Combined Statistical Area

Genesee County
Lapeer County
Livingston County
Macomb County
Monroe County
Oakland County
St. Clair County
Washtenaw County
Wayne County

Grand Rapids-Muskegon-Holland, MI Combined Statistical Area

Allegan County
Barry County
Ionia County
Kent County
Muskegon County
Newaygo County
Ottawa County

Missouri

St. Louis-St. Charles-Farmington, MO-IL Combined Statistical Area

Crawford County
Franklin County
Jefferson County
Lincoln County
St. Charles County
St. Francois County
St. Louis City
St. Louis County
Washington County
Warren County

Montana

Libby, MT MSA

Lincoln County

New Jersey

Allentown-Bethlehem-Easton, PA-NJ MSA

Warren County

New York-Newark, Bridgeport, NY-NJ-CT-PA Combined SA

Bergen County
Essex County
Hudson County
Hunterdon County
Mercer County
Morris County
Middlesex County
Monmouth County
Ocean County
Passaic County
Somerset County
Sussex County
Union County

Philadelphia-Camden-Vineland, PA-NJ-DE-MD Combined SA

Burlington County
Camden County
Cumberland County
Gloucester County
Salem County

New York

New York-Newark-Bridgeport, NY-NJ-PA-CT Combined Statistical Area

Bronx County
Dutchess County
Kings County
Nassau County
New York County
Orange County
Putnam County
Queens County
Richmond County
Rockland County
Suffolk County
Ulster County
Westchester County

Nevada

Sacramento-Arden-Arcade-Yuba City, CA-NV Combined Statistical Area

Douglas County

North Carolina

Greensboro- Winston-Salem-High Point, NC Combined Statistical Area

Alamance County

Davie County

Davidson County

Forsyth County

Guilford County

Randolph County

Rockingham County

Stokes County

Surry County

Yadkin County

Hickory-Morganton-Lenoir, NC Combined Statistical Area

Alexander County

Burke County

Caldwell County

Catawba County

Ohio

Canton-Massillon, OH MSA

Carroll County

Stark County

Cincinnati-Middleton-Wilmington, OH-KY-IN Combined Statistical Area

Brown County

Butler County

Clermont County

Clinton County

Hamilton County

Warren County

Cleveland-Akron-Elyria, OH Combined Statistical Area

Ashtabula County

Cuyahoga County

Geauga County

Lake County

Lorain County

Medina County

Portage County

Summit County

Columbus-Marion-Chillicothe, OH Combined Statistical Area

Delaware County

Fairfield County
Fayette County
Franklin County
Grant County
Knox County
Licking County
Madison County
Morrow County
Pickaway County
Ross County
Union County

Dayton-Springfield-Greenville, OH Combined Statistical Area

Champaign County
Clark County
Darke County
Greene County
Miami County
Montgomery County
Preble County

Huntington-Ashland, WV-KY-OH MSA

Adams County
Gallia County
Lawrence County
Scioto County

Parkersburg-Marietta-Vienna, WV-OH MSA

Washington County

Steubenville-Weirton, WV-OH MSA

Jefferson County

Wheeling, WV-OH MSA

Belmont County

Youngstown-Warren-East Liverpool, OH-PA Combined Statistical Area

Columbiana County
Mahoning County
Trumbull County

Oregon

Eugene-Springfield, OR MSA

Lane County

Klamath Falls, OR MSA

Klamath County

Pennsylvania

Allentown-Bethlehem-Easton, PA-NJ MSA

Carbon County

Lehigh County

Northampton County

Harrisburg-Carlisle, PA MSA

Cumberland County

Dauphin County

Perry County

Lebanon, PA MSA

Lebanon County

Johnstown, PA MSA

Cambria County

Indiana, PA MSA

Indiana County

Lancaster, PA MSA

Lancaster County

New York-Newark, Bridgeport, NY-NJ-CT-PA Combined SA

Pike County

Philadelphia-Camden-Vineland, PA-NJ-DE-MD Combined SA

Berks County

Bucks County

Chester County

Delaware County

Montgomery County

Philadelphia County

Pittsburgh-New Castle, PA Combined SA

Allegheny County

Armstrong County

Beaver County

Butler County

Fayette County

Lawrence County

Washington County

Westmoreland County

State College, PA MSA

Centre County

Waynesburg

Greene County

York-Hanover-Gettysburg, PA Combined SA

Adams County

York County

Youngstown-Warren-East Liverpool, OH-PA MSA

Mercer County

South Carolina

Augusta-Richmond County, GA-SC MSA

Aiken County

Edgefield County

Columbia –Newberry, SC Combined MSA

Calhoun County

Fairfield County

Kershaw County

Lexington County

Newberry County

Richland County

Saluda County

Greenville-Spartanburg-Anderson, SC MSA

Anderson County

Cherokee County

Greenville County

Laurens County

Oconee County

Pickens County

Spartanburg County

Union County

Tennessee

Chattanooga-Cleveland-Athens, TN Combined Statistical Area

Bradley County

Hamilton County

Marion County
McMinn County
Polk County
Sequatchie County

Clarksville, TN-KY MSA

Humphreys County
Montgomery County
Stewart County

Knoxville-Sevierville-La Follette, TN Combined Statistical Area

Anderson County
Blount County
Campbell County
Cocke County
Grainger County
Hamblen County
Jefferson County
Knox County
Loudon County
Roane County
Sevier County
Union County

Texas

Houston-Baytown-Huntsville, TX Combined Statistical Area

Austin County
Brazoria County
Chambers County
Fort Bend County
Galveston County
Harris County
Liberty County
Matagorda County
Montgomery County
San Jacinto County
Walker County
Waller County

Utah

Salt Lake City-Ogden-Clearfield, UT Combined Statistical Area

Box Elder County
Davis County
Morgan County
Salt Lake County

Summit County
Tooele County
Wasatch County
Weber County

Logan, UT MSA
Cache County

Provo-Orem, UT MSA
Juab County
Utah County

Virginia

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined Statistical Area

Alexandria City
Arlington County
Clarke County
Culpeper County
Fairfax County
Fairfax City
Falls Church City
Fauquier County
Frederick County
Fredericksburg City
Loudoun County
Manassas City
Manassas Park City
Prince William County
Spotsylvania County
Stafford County
Warren County
Winchester City

Washington

Seattle-Tacoma-Olympia, WA Combined Statistical Area

Island County
King County
Kitsap County
Mason County
Pierce County
Skagit County
Snohomish County
Thurston County

West Virginia

Charleston, WV MSA

Boone County

Clay County

Kanawha County

Lincoln County

Putnam County

Hagerstown-Martinsburg, MD-WVMSA

Berkeley County

Morgan County

Huntington-Ashland, WV-KY-OH MSA

Cabell County

Wayne County

Parkersburg-Marietta-Vienna, WV-OH MSA

Pleasants County

Wirt County

Wood County

Weirton-Steubenville, WV-OH MSA

Brooke County

Hancock County

Washington-Baltimore-Northern Virginia, DC-MD-VA-WV Combined SA

Jefferson County

Hampshire County

Wheeling, WV-OH MSA

Marshall County

Ohio County

Wisconsin

Chicago-Naperville-Michigan City, IL-IN-WI Combined Statistical Area

Kenosha County

Green Bay, WI MSA

Brown County

Kewaunee County

Oconto County

Madison-Baraboo, WI Combined Statistical Area

Columbia County

Ms. Jenny Noonan Edwards

October 2, 2008

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Dane County

Iowa County

Sauk County

Milwaukee-Racine-Waukesha, WI Combined Statistical Area

Milwaukee County

Ozaukee County

Racine County

Washington County

Waukesha County



AirData

AirData - Monitor Values Report - Criteria Air Pollutants
Generated on Monday, September 29, 2008

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: Prince George's Co, MD
Pollutant: Particles < 2.5 micrometers diameter
Year: 2007

EPA Air Quality Standards:

Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

µg/m3 = micrograms per cubic meter

4 Rows

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		PM2.5 (µg/m3)																
		24-Hour Values						Annual				Monitor Number	Site ID	Site Address	City	County	State	EPA Region
Row #	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed									
SORT	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼
1	117	33.0	30.9	28.8	26.9	28.8	0	12.11	0	1	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03		
2	29	48.0	25.3	20.2	18.0	48.0	1	13.37	0	2	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03		
												Howard		Prince				

3	112	42.4	40.2	29.0	28.5	29.0	0	11.83	0	1	240330030	University'S Beltsville Laborator	Beltsville	George's Co	MD	03
4	118	41.7	32.5	31.5	31.2	31.5	0	14.14	0	1	240330025	Bladensburg Volunteer Fire Department, 4	Bladensburg	Prince George's Co	MD	03
Grand Total							1		0							

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: Prince George's Co, MD
Pollutant: Particles < 2.5 micrometers diameter
Year: 2006

EPA Air Quality Standards:

Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

µg/m3 = micrograms per cubic meter

3 Rows

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		PM2.5 (µg/m3)														
		24-Hour Values						Annual		Monitor Number	Site ID	Site Address	City	County	State	EPA Region
Row #	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed							
SORT	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼	▲▼
1	98	35.6	33.8	32.2	31.0	33.8	0	11.49	0	1	240330030	Howard University'S Beltsville Laborator	Beltsville	Prince George's Co	MD	03
2	57	35.7	32.7	30.5	24.8	35.7	1	12.47	0	2	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03
3	109	36.3	35.2	32.5	31.8	32.5	0	12.23	0	1	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03
Grand Total							1		0							

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: Prince George's Co, MD

Pollutant: Particles < 2.5 micrometers diameter

Year: 2005

EPA Air Quality Standards:

Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

µg/m3 = micrograms per cubic meter

3 Rows

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Row #	PM2.5 (µg/m3)										Monitor Number	Site ID	Site Address	City	County	State	EPA Region
	24-Hour Values							Annual									
	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed								
SORT	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼
1	109	37.1	36.6	30.9	30.6	30.9	0	13.76	0	1	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03	
2	60	36.6	31.5	26.2	25.9	36.6	1	13.29	0	2	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03	
3	107	37.8	36.1	32.4	30.8	32.4	0	13.40	0	1	240330030	Howard University'S Beltsville	Beltsville	Prince George's Co	MD	03	



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Monitor Values Report - Criteria Air Pollutants

Geographic Area: Prince George's Co, MD
Pollutant: Particles < 2.5 micrometers diameter
Year: 2004

EPA Air Quality Standards:

Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

µg/m3 = micrograms per cubic meter

4 Rows

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Row #	PM2.5 (µg/m3)										Monitor Number	Site ID	Site Address	City	County	State	EPA Region
	24-Hour Values							Annual									
	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed								
SORT	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼	▲ ▼
1	114	44.3	41.9	37.7	30.5	37.7	1	13.33	0	1	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03	
2	61	42.0	28.0	27.9	27.6	42.0	1	12.35	0	2	240338003	Pg County Equestrian Center, 14900 Penns	Greater Upper Marlboro	Prince George's Co	MD	03	
												Howard		Prince			

3	49	38.1	29.5	29.5	27.5	38.1	1	12.64	0	1	240330030	University'S Beltsville Laborator	Beltsville	George's Co	MD	03
4	27	16.9	15.4	14.2	14.2	16.9	0	9.75	0	1	240330002	Goddard Space Flight Center	Greenbelt	Prince George's Co	MD	03
Grand Total							3		0							

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: District Of Columbia
Pollutant: Particles < 2.5 micrometers diameter
Year: 2007

EPA Air Quality Standards:

Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

µg/m3 = micrograms per cubic meter

4 Rows

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		PM2.5 (µg/m3)																	
		24-Hour Values						Annual					Monitor Number	Site ID	Site Address	City	County	State	EPA Region
Row #	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed	Mean	# Exceed	Monitor Number	Site ID	Site Address	City	County	State	EPA Region	
1	338	45.6	45.5	40.8	37.3	33.1	0	13.00	0	1	110010043	2500 1st Street, N.W. Washington Dc	Washington	Washington city	DC	03			
2	117	41.2	30.6	28.7	28.5	28.7	0	13.68	0	1	110010042	Park Services Office 1100 Ohio Drive	Washington	Washington city	DC	03			
3	334	45.6	45.4	42.7	38.6	32.8	0	13.60	0	1	110010041	34th. And Dix	Washington	Washington	DC	03			

<http://iaspub.epa.gov/airsdata/ADAQS.monvals?geotype=st&geocode=DC&geoinfo=st%7EDC%7EDistrict+of+Columbia&pol...> 10/2/2008

4	57	42.1	29.2	27.4	26.9	29.2	0	14.45	0	2	110010041	Streets, N.E. 34th. And Dix Streets, N.E.	Washington	Washington city	DC	03	
Grand Total							0		0								

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: District Of Columbia
Pollutant: Particles < 2.5 micrometers diameter
Year: 2006

EPA Air Quality Standards:
Particles < 2.5 micrometers diameter: 35 µg/m3 (24-Hour Average), 15.0 µg/m3 (annual mean)

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4 Rows
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Row #	# Obs	24-Hour Values						Annual		Monitor Number	Site ID	Site Address	City	County	State	EPA Region
		1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed							
1	118	35.2	33.6	33.0	32.6	33.0	0	13.31	0	1	110010042	Park Services Office 1100 Ohio Drive	Washington	Washington city	DC	03
2	352	74.1	45.0	39.6	37.6	35.0	0	13.43	0	1	110010041	34th. And Dix Streets, N.E.	Washington	Washington city	DC	03
3	59	75.8	38.6	36.1	30.5	38.6	1	14.27	0	2	110010041	34th. And Dix Streets,	Washington	Washington city	DC	03

<http://iaspub.epa.gov/airsdata/ADAQS.monvals?geotype=st&geocode=DC&geoinfo=st%7EDC%7EDistrict+of+Columbia&pol...> 10/2/2008

4	352	41.1	40.8	38.3	35.3	33.2	0	12.98	0	1	110010043	N.E. 2500 1st Street, N.W. Washington Dc	Washington	Washington city	DC	03
Grand Total							1		0							

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Monitor Values Report - Criteria Air Pollutants

Geographic Area: District Of Columbia
Pollutant: Particles < 2.5 micrometers diameter
Year: 2005

EPA Air Quality Standards:

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µg/m3 = micrograms per cubic meter

4 Rows

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Row #	# Obs	PM2.5 (µg/m3)						# Exceed	Mean	# Exceed	Monitor Number	Site ID	Site Address	City	County	State	EPA Regio		
		24-Hour Values																Annual	
		1st Max	2nd Max	3rd Max	4th Max	98th Pct													
1	351	44.3	42.5	40.2	36.2	34.4	0	14.64	0	1	110010043	2500 1st Street, N.W. Washington Dc	Washington	Washington city	DC	03			
2	117	38.4	37.2	36.4	33.2	36.4	1	15.65	1	1	110010042	Park Services Office 1100 Ohio Drive	Washington	Washington city	DC	03			
3	326	43.4	42.7	39.0	37.5	36.2	1	14.88	0	1	110010041	34th. And Dix	Washington	Washington	DC	03			

<http://iaspub.epa.gov/airsdata/ADAQS.monvals?geotype=st&geocode=DC&geoinfo=st%7EDC%7EDistrict+of+Columbia&pol...> 10/2/2008

4	68	38.7	31.2	30.3	28.7	31.2	0	15.67	1	2	110010041	Streets, N.E. 34th. And Dix Streets, N.E.	Washington	Washington city	DC	03
Grand Total							2		2							

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		PM2.5 (µg/m3)																	
		24-Hour Values						Annual					Monitor Number	Site ID	Site Address	City	County	State	EPA Region
Row #	# Obs	1st Max	2nd Max	3rd Max	4th Max	98th Pct	# Exceed	Mean	# Exceed	Mean	# Exceed	Monitor Number	Site ID	Site Address	City	County	State	EPA Region	
1	355	42.4	42.3	38.6	37.4	34.8	0	14.43	0	1	110010043	2500 1st Street, N.W. Washington Dc	Washington	Washington city	DC	03			
2	118	43.0	42.1	36.0	35.8	36.0	1	14.53	0	1	110010042	Park Services Office 1100 Ohio Drive	Washington	Washington city	DC	03			
3	337	44.3	41.6	41.4	39.1	38.4	1	14.93	0	1	110010041	34th. And Dix	Washington	Washington	DC	03			

<http://iaspub.epa.gov/airsdata/ADAQS.monvals?geotype=st&geocode=DC&geoinfo=st%7EDC%7EDistrict+of+Columbia&pol...> 10/2/2008

4	61	41.9	41.8	34.6	34.2	41.8	1	14.48	0	2	110010041	Streets, N.E. 34th. And Dix Streets, N.E.	Washington	Washington city	DC	03
Grand Total							3		0							

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