

DRAFT

Ms. Judith Katz
Director, Air Protection Division
EPA Region III
Mail Code: 3AP00
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Findings of attainment for the 1-hour ozone nonattainment areas in Virginia

Dear Judy,

The Virginia Department of Environmental Quality requests that the Environmental Protection Agency make a formal determination that all areas within Virginia have attained the 1-hour ozone National Ambient Air Quality Standard (NAAQS) of 0.12 ppm ozone. The ozone monitoring network data in the Air Quality Subsystem, which has been gathered, quality-assured, and certified in accordance with all federal requirements and procedures, supports this request.

The following chart shows the maximum 1-hour design values by area in the Commonwealth, with the exception of Northern Virginia. Based on this information, these areas attained the 1-hour ozone NAAQS of 0.12 ppm as of 2005.

Area	2002-2004 Design Value	2003-2005 Design Value
Richmond Area	0.110 ppm	0.111 ppm
Hampton Roads Area	0.099 ppm	0.098 ppm
Fredericksburg Area	0.105 ppm	0.114 ppm
Winchester Area	0.090 ppm	0.087 ppm
Roanoke Area	0.087 ppm	0.089 ppm

Data from the VDEQ Air Monitoring Office, Carolyn Stevens, February 14, 2007.

The following chart shows the maximum 1-hour design value for the Washington, D.C. metropolitan nonattainment area. This design value is based on the Greenbelt monitor in Maryland for 2003-2005. Based on this information, the Washington, D. C.

metropolitan area, which is partially comprised of the Northern Virginia area, has attained the 1-hour ozone NAAQS of 0.12 ppm as of 2005.

1-hour Ozone NAAQS Design Value for the Washington DC area		
Monitor	Design Value	Years
Greenbelt, 24-033-0002	120 ppb	2003-2005

Data from the Metropolitan Washington Council of Governments, Sunil Kumar, February 20, 2007

After reviewing the data summarized above, please provide a formal determination that these areas of Virginia have indeed attained the 1-hour ozone NAAQS. This standard has been revoked; however, a formal determination of attainment is necessary to dispel any confusion regarding air quality planning concerns in light of recent court decisions and also in light of ambiguities in guidance and policy. Further, implementation of air pollution control strategies on both the state and national levels was required to bring about this improved air quality. Many of these strategies were quite expensive to implement, and a formal determination of attainment for these areas will validate the necessity of the control measures.

If you have any questions about this request, please do not hesitate to contact me or my staff. Thank you for your prompt attention to this matter, and Virginia looks forward to working with you on the challenges of further improving air quality.

Sincerely,

James E. Sydnor
VDEQ Air Division Director

Cc: Ms. Joan Rohlf, Chief Air Quality Planner, MWCOG
Mr. Tad Aburns, Director - Air and Radiation Division, MDE
Mr. Stan Tracey, Acting Air Division Director, DC Department of the Environment