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RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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TDD 401-222-4462

October 21, 2011

H. Curtis Spalding, Regional Administrator  
EPA Region I  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

Dear Mr. Spalding:

As you are aware, Assistant Administrator Gina McCarthy issued a memorandum on 22 September 2011 outlining EPA's plans to implement the 2008 revised National Ambient Air Quality Standard (NAAQS) for ozone, which is 0.075 ppm as an eight-hour average. Implementation of that standard had been postponed pending a reconsideration of the NAAQS.

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990, Rhode Island submitted a letter to the EPA on 12 March 2009 recommending that the State be designated as nonattainment for the 2008 revised ozone NAAQS. At that time, ozone concentrations measured at all three of the State's ozone monitoring sites exceeded the revised standard.

According to the September 2011 memorandum, EPA will consider both the 2009 state recommendations and the most current available certified ozone monitoring data when making attainment status designations. In 2008 – 2010, the most recent period for which certified data are currently available, the ozone levels measured at two of the Rhode Island monitoring sites, West Greenwich and East Providence, were lower than the NAAQS and the level at the third site, Narragansett, was slightly above the NAAQS (0.076 ppm). Based on those data, Rhode Island likely would be classified as a marginal nonattainment area.


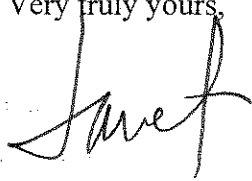
However, monitored ozone levels during the 2011 ozone season were such that, if 2009 - 2011 data were used for the designation, all three sites would be in attainment of the NAAQS. Certification of a calendar year's monitoring data is not required until May of the following year. However, Rhode Island intends to certify its ozone and related quality assurance/quality control data for the 2011 ozone season by February 2012 so that EPA can consider those data when determining Rhode Island's attainment status.



As discussed in Rhode Island's March 2009 letter, the presumptive boundaries of an ozone attainment/nonattainment area are those of the associated Core Based Statistical Area (CBSA). Rhode Island monitors are located in the Providence–New Bedford–Fall River RI-MA CBSA, which includes all five of the Rhode Island counties and Bristol County, Massachusetts. For ease of administration, I am recommending that, as with the previous ozone NAAQS, the Rhode Island 2008 ozone attainment area be defined by the boundaries of the State of Rhode Island, rather than by the boundaries of the CBSA.

If you have any questions about this issue, please feel free to contact Barbara Morin of the Office of Air Resources at (401) 222-4700, extension 7012.

Very truly yours,



Janet Coit

Director, Rhode Island Department of Environmental Management