

US EPA ARCHIVE DOCUMENT



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 5, 2009

Rick Albright, Director
Office of Air, Waste and Toxics (AT-128)
U. S. Environmental Agency, Region 10
1200 Sixth Ave.
Seattle WA 98101

Dear Mr. Albright:

The state of Washington has a single monitor that violated the 2008 8-hour ozone standard during the 3-year period 2006-2008. We would like to inform you of the state of Washington's plans to develop recommended designations for the entire state and a recommended nonattainment area boundary for the violating monitor and submit them to EPA. We commit to submitting the recommendations by June 12, 2009. While we are not able to make a formal state submittal by EPA's requested date of March 12, 2009, our intention is to keep Region 10 informed so that EPA will be able to fulfill its statutory duties for designations.

DESIGNATION RECOMMENDATIONS

The Washington State Department of Ecology is developing its recommendations from the most recent available 8-hour ozone monitoring data (2006-2008). A summary of the monitoring data titled "2006-2008 8-Hour Ozone Design Values" is enclosed. All data are available in EPA's AQS air monitoring database.

Puget Sound/Western Washington

Three monitors in King County (Lake Sammamish; North Bend; and Mud Mt., Enumclaw), a single monitor in Pierce County (Pack Forest), and a single monitor in Thurston County (Yelm) provide complete, quality-assured data for the 3-year period. The monitor at Mud Mt., Enumclaw violates the 8-hour ozone standard and means that we will have to develop a nonattainment area boundary recommendation as is discussed below.

Washington Portion of the Portland, OR-Vancouver, WA Area

Single monitors in Clark County, WA (Blairmount), Multnomah County, OR (SE Lafayette), and Clackamas County, OR (Carus Trailer) provide complete, quality-assured data for the 3-year period. The Carus site has been the design site for this area for decades and has the highest



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design value of the three monitors for 2006-2008. We intend to recommend a designation of *Attainment* for Clark County, WA.

Spokane

The monitor to the northeast of Spokane at Greenbluff has complete, quality-assured data for the 3-year period. The monitor met the 8-hour ozone standard. The monitor to the southeast in the Turnbull National Wildlife Refuge at Cheney does not meet completeness for 2 of the 3 years. We have compared the fourth high values and design values at both sites. The data are shown in the enclosed "Spokane County Monitoring Site Comparison." Examination of data for 1999-2006 indicates that the fourth high was higher at Greenbluff for each of the 8 years and that each of the 6 3-year design values within the 8-year period was higher at Greenbluff. This confirms our long-held understanding that the Greenbluff site is the design site for Spokane County. We intend to recommend a designation of *Attainment* for Spokane County.

Remainder of the State

We intend to recommend a designation of *Unclassifiable* for the remainder of the state. Our designations will not generally apply to Indian lands.

NONATTAINMENT AREA BOUNDARY RECOMMENDATION

We are developing a Nine Factor Analysis to determine a nonattainment boundary for the violating monitor at Mud Mt., Enumclaw that addresses both the violating area and the areas contributing to the violation. As recommended by EPA's guidance, we are starting with the Seattle-Tacoma-Olympia, WA Combined Statistical Area (CSA) as a default. We expect to add and subtract areas from the default CSA as we work through the Nine-Factor Analysis to arrive at a final recommendation.

The default CSA covers all or parts of the jurisdictions of three local air agencies: Northwest Clean Air Agency (NWCAA), Puget Sound Clean Air Agency (PSCAA), and Olympic Regional Clean Air Agency (ORCAA). We are coordinating with the three agencies. PSCAA has already supplied us with information for the Nine Factor Analysis.

STATE PROCESS FOR SUBMISSION

State requirements increase the time needed to make a formal submittal to EPA. State rules require us to get public input before any submission of recommendations for designations or a nonattainment boundary. We must provide 30-day public notice and hold a public hearing on our proposed recommendations. As the Governor's designee, the Ecology Director will submit final recommendations to the EPA Region 10 Administrator.

We trust our overview helps you understand what we are doing and our intentions. We do want to keep you informed and allow you to meet your statutory responsibilities. Doug Schneider of


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my staff is coordinating development of our recommendations. Please contact Doug at 360-407-6874 or dsch461@ecy.wa.gov if you have questions.

Sincerely,



Stuart A. Clark
Program Manager
Air Quality Program

Enclosure

cc: Doug Schneider, Ecology
Sarah Rees, Ecology
Dennis McLerran, PSCAA
Mark Asmundson, NWCAA
Fran McNeil, ORCAA
Keith Phillips, OFM
Mahbubul Islam, EPA Region 10

SPOKANE COUNTY MONITORING SITE COMPARISON

YEAR	GREENBLUFF			TURNBULL SLOUGH, CHENEY			DIFFERENCE	
	4th High	3-Year Period	Design Value	4th High	3-Year Period	Design Value	4th High	Design Value
1999	0.065			0.064			0.001	
2000	0.068			0.062			0.006	
2001	0.071	1999-2001	0.068	0.066	1999-2001	0.064	0.005	0.004
2002	0.071	2000-2002	0.070	0.059	2000-2002	0.062	0.012	0.008
2003	0.079	2001-2003	0.074	0.069	2001-2003	0.065	0.010	0.009
2004	0.069	2002-2004	0.073	0.060	2002-2004	0.063	0.009	0.010
2005	0.067	2003-2005	0.072	0.059	2003-2005	0.063	0.008	0.009
2006	0.069	2004-2006	0.068	0.063	2004-2006	0.061	0.006	0.008
2007	0.064	2005-2007	0.067	n/a	2005-2007	n/a	n/a	n/a
2008	0.058	2006-2008	0.064	n/a	2006-2008	n/a	n/a	n/a

SUMMARY

GREENBLUFF > TURNBULL SLOUGH, CHENEY

4th High 8 out of 8 years

Design Value 6 of 6 3-year periods

2006-2008 8-Hour Ozone Design Values

5-Mar-09

COUNTY	SITE ID	MONITOR	Req	MONITORED DAYS						4TH MAXIMUM			DESIGN VALUE	ATTAINS STANDARD?
				2006		2007		2008		2006	2007	2008		
				Mon	%	Mon	%	Mon	%					
Whatcom	530730005	Custer	153	144	94	n/a	n/a	n/a	n/a	0.055	n/a	n/a	n/a	Unclassifiable
King	530330080	Beacon Hill	153	n/a	n/a	135	88	149	97	n/a	0.046	0.046	n/a	Unclassifiable
King	530330010	Lake Sammamish	153	147	96	133	87	149	97	0.070	0.058	0.054	0.061	Yes
King	530330017	North Bend	153	151	99	120	78	150	98	0.067	0.057	0.058	0.061	Yes
King	530330023	Mud Mt., Enumclaw	153	149	97	126	82	149	97	0.087	0.068	0.075	0.077	NO
Pierce	530531008	Pack Forest	153	147	96	134	88	153	100	0.080	0.063	0.068	0.070	Yes
Pierce	530530012	Mt. Rainier	153	138	90	145	95	110	72	0.062	0.064	n/a	n/a	Unclassifiable
Thurston	530670005	Yelm	153	147	96	145	95	149	97	0.068	0.054	0.060	0.061	Yes
Clark	530110011	Blairmount	153	130	85	144	94	152	99	0.066	0.060	0.060	0.062	Yes
Spokane	530630001	Turnbull Slough	153	130	85	102	67	90	59	0.063	n/a	n/a	n/a	Unclassifiable
Spokane	630630046	Greenbluff	153	148	97	122	80	152	99	0.069	0.064	0.058	0.064	Yes
OREGON														
Multnomah	410510080	SE Lafayette	153	153	100	150	98	151	99	0.064	0.056	0.06	0.060	Yes
Clackamas	410052002	Milwaukie	153	151	99	153	100	n/a	n/a	0.068	0.056	n/a	n/a	Unclassifiable
Clackamas	41005004	Carus Trailer	153	149	97	153	100	153	100	0.072	0.058	0.066	0.065	Yes

Does not meet 75% of required monitoring days data completeness criteria