

US EPA ARCHIVE DOCUMENT

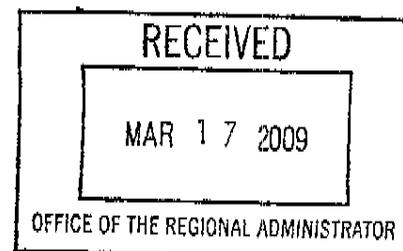
OK  
RI-09-000-3593

**State of Rhode Island and Providence Plantations**

State House  
Providence, Rhode Island 02903-1196  
401-222-2080

**Donald L. Carcieri**  
Governor

March 12, 2009



Ira W. Leighton  
Acting Regional Administrator  
EPA Region I  
1 Congress Street, (Suite 1100-RAA)  
Boston, MA 02114-202

Dear Mr. Leighton:

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990, Rhode Island is hereby submitting its recommendation for the State's attainment status designation for the 2008 revised National Ambient Air Quality Standard (NAAQS) for ozone. Section 107(d)(1) defines nonattainment areas as areas that do not meet, or that contribute to ambient air quality in a nearby area that does not meet, the NAAQS for a pollutant.

A site is in violation of the eight-hour NAAQS if the monitored design value for that site is greater than 75 ppb. The design value is calculated by averaging the fourth highest maximum daily eight-hour ozone concentration measured at a site each year in three consecutive years. The eight-hour ozone design values for the three Rhode Island ozone monitoring sites for the two most recent three-year periods, 2005 – 2007 and 2006 - 2008, are as follows:

Site	County	Design Value (ppb)	
		2005-2007	2006-2008
W. Greenwich	Kent	86	80
Narragansett	Washington	84	81
E. Providence	Providence	84	82

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Since the design values for all three of the Rhode Island monitoring sites exceed 75 ppb, the entire State of Rhode Island is in monitored violation of the 2008 ozone NAAQS.

EPA's guidance for designating areas for the 2008 revised ozone NAAQS<sup>1</sup> states that the Core Based Statistical Area (CBSA) associated with the violating monitor should be used to determine the presumptive boundaries of a nonattainment area. All of the 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 in Massachusetts.

For ease of administration, I am recommending that, as with previous ozone NAAQS, the Rhode Island 2008 ozone nonattainment area be defined by the boundaries of the State of Rhode Island, rather than the boundaries of the CBSA. Bristol County, Massachusetts would continue to be included in the Eastern Massachusetts nonattainment area, which has similar design values as those in Rhode Island.

Although I am not asking that upwind areas be included in the Rhode Island nonattainment areas, Rhode Island is keenly aware that the State's ozone levels are strongly influenced by upwind states' emissions. Therefore, if Rhode Island is to come into attainment with the 2008 ozone NAAQS, it is essential for EPA to adequately address long-range transport of ozone and ozone precursors.

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

Very truly yours,

  
Donald L. Carcieri  
Governor

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<sup>1</sup> Memo from Robert J Meyers, Principal Deputy Assistant Administrator, US EPA, to Regional Administrators, "Area Designations for the 2008 Revised Ozone National Ambient Air Quality Standards," December 4, 2008.