

US EPA ARCHIVE DOCUMENT

JAMES H. DOUGLAS  
GOVERNOR



State of Vermont  
OFFICE OF THE GOVERNOR

June 4, 2009

Mr. Ira W. Leighton  
Acting Regional Administrator  
EPA New England, Region 1  
1 Congress Street  
Suite 1100  
Boston, MA 02114-2023

**Re: VERMONT DESIGNATIONS FOR THE 2008 REVISED OZONE  
NATIONAL AMBIENT AIR QUALITY STANDARDS**

Dear Mr. Leighton:

In accordance with the requirements of the Clean Air Act (CAA) pertaining to area designations for the 2008 revised ozone National Ambient Air Quality Standards (NAAQS), we are pleased to recommend that the State of Vermont be designated as attainment/unclassifiable for the both the primary and secondary ozone NAAQS. This fulfills our obligation to identify areas in Vermont that have ozone concentrations above the Environmental Protection Agency's (EPA) 8-hour primary and secondary standards which were promulgated on March 12, 2008.

The State of Vermont has used ozone data from for 2005-2007 from sites located in Bennington and Chittenden counties, in the towns of Bennington and Underhill, respectively. These monitoring locations effectively span the state in a north/south direction. The attached tables summarize the data and show that both of these monitoring locations currently attain the 8-hour ozone primary and secondary NAAQS. Regional concentration patterns for monitored ozone lend support to our belief that all other counties in Vermont similarly meet the ozone standards.

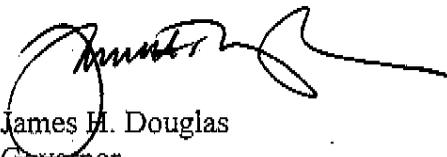
In addition, I would like to reemphasize that Vermont's attainment status is precarious given ozone's regionally episodic nature and the proven transport of ozone precursors from regions upwind regions. We strongly believe that maintenance of our attainment status depends on the equitable implementation of control measures on sources of ozone-forming precursor emissions in the eastern half of the US.

Vermont is committed to working with states in the Ozone Transport Region (OTR) on regional control strategies. However, evidence is strong that transport of ozone precursors does not stop at the OTR borders. More broadly applicable measures for, at

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least the eastern half of the US, are needed to achieve the comprehensive emission reductions, of nitrogen oxides in particular, that will eliminate the current widespread non-attainment of ozone standards and the resulting toll on human health.

Sincerely,



James H. Douglas  
Governor

cc: David Conroy, Air Programs Branch (EPA Region 1)  
Anne Arnold, Air Quality Unit (EPA Region 1)  
Enclosures

STATE OF VERMONT  
 AREA DESIGNATIONS UNDER CLEAN AIR ACT (CAA) SECTION 107(D)  
 PRIMARY AND SECONDARY OZONE NAAQS

POLLUTANT	DESIGNATED AREA (COUNTY)	-----DESIGNATIONS-----	
		NON- ATTAINMENT	ATTAINMENT/ UNCLASSIFIABLE
8-hour ozone	State of Vermont		X
<i>8-hour ozone</i>	<i>Addison</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Bennington</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Caledonia</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Chittenden</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Essex</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Franklin</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Grand Isle</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Lamoille</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Orange</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Orleans</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Rutland</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Washington</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Windham</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Windsor</i>		<i>X</i>

**Vermont Primary and Secondary Ozone Compliance Data**

Year	-----Bennington-----		-----Underhill-----	
	Annual 4th maximum daily maximum average	Truncated 3 year average of annual 4th maximum	Annual 4th maximum daily maximum average	Truncated 3 year average of annual 4th maximum
	-----(ppm)-----			
1987	0.083			
1988	0.102			
1989	0.082	0.089	0.070	
1990	0.086	0.090	0.072	
1991	0.093	0.087	0.080	0.074
1992	0.081	0.086	0.086	0.079
1993	0.082	0.085	0.076	0.080
1994	0.081	0.081	0.075	0.079
1995	0.078	0.080	0.074	0.075
1996	0.079	0.079	0.065	0.071
1997	0.082	0.079	0.072	0.070
1998	0.075	0.078	0.073	0.070
1999	0.083	0.080	0.079	0.074
2000	0.071	0.076	0.071	0.074
2001	0.083	0.079	0.076	0.075
2002	0.086	0.080	0.084	0.077
2003	0.073	0.080	0.074	0.078
2004	0.074	0.077	0.071	0.076
2005	0.073	0.073	0.069	0.071
2006	0.068	0.071	0.065	0.068
2007	0.077	0.072	0.077	0.070

The 2008 primary and secondary ozone NAAQS is 0.075 ppm. For the 2008 attainment designation (2005-2007), Vermont is in attainment for the primary and secondary ozone NAAQS.