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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

December 1, 2011

Mr. Shawn M. Garvin
Regional Administrator
U.S. Environmental Protection Agency
Region III
1650 Arch Street (3RA00)
Philadelphia PA 19103-2023

Dear Mr. Garvin:

Thank you for the opportunity to revise our recommendation for Maryland's nonattainment areas under the 2008 8-hour ozone standard. In accordance with Section 107(d)(1) of the Clean Air Act, Maryland's boundary recommendations for attainment, nonattainment, and control region areas under the revised 8-hour ozone standard are provided below.

Lowering the ozone standard from 0.08 parts per million (ppm) to 0.075 ppm will require significant reductions in both local and regional ozone pollution. Maryland will continue to adopt local control programs to reduce locally formed ozone. Since most of Maryland is already heavily regulated due to existing ozone and fine particle requirements, Maryland will also be relying heavily on reductions in transported pollution in order to meet this more stringent standard. Maryland research shows that measured, "incoming" ozone often already exceeds the 0.075 ppm standard.

Maryland is pleased that EPA has initiated efforts to adopt federal rules to reduce ozone transport. We are also very concerned that these efforts do not go far enough and that EPA may not be successful in finalizing the necessary regulations to allow Maryland to comply with the Clean Air Act and to protect the health of our citizens.

Because of these concerns, Maryland, like several other Mid-Atlantic and Northeast states, urges EPA to consider establishing a very large nonattainment area for the new standard that would include at least the following states: Delaware, District of Columbia, Kentucky, Indiana, Illinois, Maryland, Michigan, Missouri, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and Wisconsin. These states are the states that EPA has identified as significantly contributing to Maryland's ozone problem. This large nonattainment area would guarantee that appropriate emission reductions from upwind sources are achieved. Additional supporting technical information on the large nonattainment area is being forwarded to EPA Region III by the Maryland Department of the Environment.



Mr. Shawn M. Garvin
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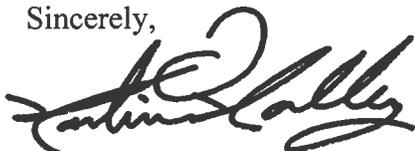
To the extent that EPA can guarantee that ozone transport will be sufficiently controlled through federal rules, Maryland recommends that most of our existing historical nonattainment structure remain intact. The exception would be for Washington, Kent, and Queen Anne's Counties. The 2008-2010 design values (DVs) show Washington County at 72 ppb (parts per billion), and Kent and Queen Anne's at 75 ppb. Based upon these monitored values, Maryland would like to change our recommendations for these counties from "nonattainment" to "unclassifiable/attainment."

Table 1, which is enclosed with this letter, summarizes the specific areas that Maryland is recommending as attainment, nonattainment, or secondary control region areas.

Maryland recognizes that this boundary recommendation submittal is only the first step in the ozone designation process, and looks forward to working with the Environmental Protection Agency (EPA) and Maryland stakeholders during the final steps of the designation process.

If you have any questions on this submission, please do not hesitate to contact Robert Summers, Ph.D., Secretary, Maryland Department of Environment at 410-537-3086 or George (Tad) Aburn, Director of the Air and Radiation Management Administration at 410-537-3255.

Sincerely,



Governor

cc: Robert M. Summers, Ph.D., Secretary, Maryland Department of the Environment

Enclosure: Table 1

TABLE 1

Maryland's Revised 8-hour Ozone Designation Recommendation

<u>Designated Area</u>	<u>Designation</u>
<i>Baltimore Nonattainment Area</i>	
Anne Arundel County	Nonattainment
Baltimore City	Nonattainment
Baltimore County	Nonattainment
Carroll County	Nonattainment
Harford County	Nonattainment
Howard County	Nonattainment
<i>Washington DC-MD-VA Nonattainment Area</i>	
Calvert County	Nonattainment
Charles County	Nonattainment
Frederick County	Nonattainment
Montgomery County	Nonattainment
Prince Georges County	Nonattainment
<i>Philadelphia-Wilmington-Atlantic City (PA-NJ-DE-MD) Nonattainment Area</i>	
Cecil County	Nonattainment
<i>Unclassifiable (Attainment) Counties</i>	
Allegany County	Attainment
Garrett County	Attainment
Washington County	Attainment
St. Mary's County	Attainment
Kent County	Attainment
Queen Anne's County	Attainment
Caroline County	Attainment
Talbot County	Attainment
Dorchester County	Attainment
Wicomico County	Attainment
Somerset County	Attainment
Worcester County	Attainment