

US EPA ARCHIVE DOCUMENT



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August 30, 2004

Mr. Donald S. Welsh
Regional Administrator
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Welsh:

This letter serves to transmit additional information to you concerning the recent request by the Commonwealth of Virginia that EPA reclassify the Richmond area from a moderate to a marginal nonattainment area under the 8-hour Ozone National Ambient Air Quality Standard. This additional information is being provided as a result of ongoing discussions of our request with regional air staff.

We continue to believe that the information previously submitted to support this request builds a substantial case to approve this request. The preponderance and weight of the evidence presented clearly points to the marginal characteristics of the Richmond nonattainment area and that the area is likely to attain the 8-hour ozone standard as soon as 2007. It also shows that the additional environmental benefits to be obtained from the higher moderate classification for Richmond would be minor at best. Finally, in terms of new technical information, the most current air quality data for the period of 2002 to 2004 (to date) indicates that the ozone design values for all the Richmond monitors are now within the marginal ozone concentration range. Enclosure I provides additional monitoring and modeling information to support our request.

In addition to the technical information and analyses provided as part of this process, I would like to transmit to you our current plan to proactively evaluate and implement additional controls in the Richmond area to further improve local and regional air quality. First and foremost, because the geographic area of the Richmond nonattainment area has increased under the 8-hour ozone standard, we will begin the process to extend certain nonattainment

requirements to the additional jurisdictions involved to satisfy basic nonattainment requirements and area equity issues. These jurisdictions include Charles City County, Prince George County, and the City of Petersburg. This action will include the implementation of such measures as reformulated gasoline, stage I vapor recovery, and other existing source (RACT) controls. We hope to have these measures implemented in the extended area by the summer of 2006.

As part of the regulatory process mentioned above, the agency will initiate the process of extending some or all of the "Ozone Transport" controls on various area sources to the Richmond area. These measures have been or are being adopted in the Northern Virginia portion of the Washington, D. C. 1-hour ozone nonattainment area. We believe such an action would be warranted and appropriate to further support our reclassification request. However, because we have not yet established the Lead Planning Organization (LPO) for the Richmond area, we must make such a commitment contingent upon the review and discussion of these controls by this group. We hope to implement the measures that are formally selected in the Richmond area by the summer of 2006.

Beyond the controls mentioned above, the Virginia Legislature has initiated the evaluation of two additional ozone precursor control programs. First, a report and plan has been developed for the implementation of a remote-sensing program for vehicle emissions in several areas of Virginia, including Richmond. Second, the agency is currently working with interested parties and plans to support a utility bill similar to the North Carolina "Clean Smokestacks" program. We expect both these potential control measures will be considered further during the next legislative session in 2005. We will provide additional details on the adoption and implementation of these potential measures once they are determined. A list of all the measures identified is contained in Enclosure II.

In conclusion, I continue to urge you to approve the Richmond reclassification request and believe that this additional information further strengthens our case. Please contact me or John Daniel of my staff if you have any questions concerning this matter.

Sincerely,

Robert G. Burnley

Enclosures

cc: W. Tayloe Murphy, Jr.
Judith Katz
John M. Daniel, Jr.