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June 2, 2011

H. Curtis Spalding
Regional Administrator
U.S. Environmental Protection Agency, Region 1
5 Post Office Square – Suite 100
Boston, MA 02114-2023

Dear Mr. Spalding:

I am responding to your letter of April 11, 2011 requesting my recommendation concerning Massachusetts' attainment status under the new 1-hour National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂), which the Environmental Protection Agency (EPA) promulgated in June 2010.

Massachusetts currently has six air quality monitors that measure ambient SO₂ concentrations throughout the State. The certified data from these monitors (Attachment 1) demonstrates that the monitored SO₂ levels for 2008-2010 do not exceed the 1-hour standard of 75 ppb at any monitor.

However, the EPA has concluded that monitoring data alone is not sufficient for a designation of "attainment" because the monitors do not fully characterize concentrations of SO₂ around stationary sources, such as power plants. Therefore, in addition to monitoring, states must model the impacts of SO₂ emissions from significant stationary sources to support a designation of "attainment." The EPA acknowledges in its designation guidance that it does not expect states to complete this modeling by June 3, 2011.

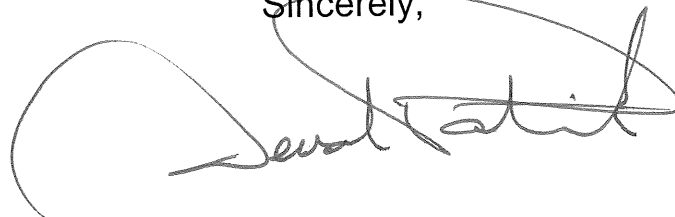
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I am recommending that all of Massachusetts be designated “unclassifiable” under the 1-hour SO₂ NAAQS, because Massachusetts has not yet completed modeling on which to base a recommendation of “attainment.” We expect to complete the required monitoring and modeling by June 2013 as specified in the EPA’s guidance.

If you need additional information concerning this recommendation, please contact Commissioner Ken Kimmell at the Department of Environmental Protection (617-292-5856). An electronic copy of this material is being provided to your staff.

I look forward to continuing to work with you to improve air quality in Massachusetts.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Curtis Spalding". The signature is written in a cursive style with a large, sweeping initial "H" and a long, horizontal tail.

Enclosure