

## west virginia department of environmental protection

Division of Air Quality 601 57<sup>th</sup> ST SE Charleston, WV 25304 Earl Ray Tomblin, Governor Randy C. Huffman, Cabinet Secretary dep.wv.gov

January 22, 2013

Ms. Diana Esher, Director Air Protection Division U.S. EPA Region 3 1650 Arch Street (3AP00) Philadelphia, PA 19103-2029

Re: West Virginia Update on 1-hour Sulfur Dioxide (SO<sub>2</sub>) Monitoring Data and Designations

Dear Ms. Esher:

In a May 23, 2011 letter from Cabinet Secretary Randy Huffman to EPA Region 3 Regional Administrator Shawn Garvin, WVDEP identified five counties that were violating the 2010 1-hour SO<sub>2</sub> standard, based upon the most recent available monitoring data at that time (2008-2010). The counties included: Brooke, Hancock, Marshall, Monongalia and Wood. Subsequent air monitoring data (2010-2012) indicates that the air quality has significantly improved in three of those counties: Hancock, Monongalia, and Wood, showing that these counties appear to be fully meeting the standard. Therefore, West Virginia is now recommending that EPA designate these counties as attainment/unclassifiable for the 2010 1-hour SO<sub>2</sub> standard.

WVDEP has uploaded the pertinent data into EPA's Air Quality System, (AQS) but has not yet completed all the necessary quality control/quality assurance procedures. One complicating factor is the 2010-2012 monitoring data from monitor 54-107-1002, located in Parkersburg, WV (Wood County). This monitor is now showing attainment of the standard, with a 2010-2012 design value of 52 ppb. Although 2011 data does not meet the capture criteria for this monitor, a substitution analysis of the data was conducted in accordance with 40 C.F.R Part 50, Appendix T. WVDEP and Ohio EPA worked jointly on this analysis and both are in support of the results. The monitor remains in attainment following appropriate consideration of missing data.

Due to the recent retirement of a key staff person, we may not be able to perform certification of the uploaded AQS values as quickly as we may have done in the past. We plan to certify the West Virginia 1-hour SO<sub>2</sub> data as soon as practicable, but no later than March 29, 2013. We urge EPA to consider the current uploaded AQS data in making its designations under the 2010 1-hour SO<sub>2</sub> standard. If you or your staff have any questions or would like additional information, please feel free to contact me at (304) 926-0462 or Fred Durham, Deputy Director, at (304) 926-0499 ext. 1242.

Sincerely

John A. Benedict, Director Division of Air Quality

cc: Donna Mastro