



State of Rhode Island and Providence Plantations

State House
Providence, Rhode Island 02903-1196
401-222-2080

Donald L. Carcieri
Governor

October 14, 2009

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

Dear Mr. Leighton:

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990, Rhode Island is hereby recommending that the entire State of Rhode Island be designated as an unclassifiable attainment area for the revised National Ambient Air Quality Standard (NAAQS) for lead, which was promulgated on October 15, 2008. This recommendation is based on the absence of ambient air lead monitoring data for Rhode Island generated using the methodology specified in the NAAQS rule.

Rhode Island has measured lead levels in Providence since 2001. The sampling and analytical methods employed at that site are not consistent with the current EPA requirements for NAAQS monitoring and thus the data generated at that site cannot be used to determine attainment status for the lead NAAQS. However, those data indicate that it is very unlikely that Rhode Island ambient lead levels exceed the NAAQS.

EPA's revised lead NAAQS is $0.15 \mu\text{g}/\text{m}^3$, as the maximum 3-month average over a 3-year period measured in total suspended particulates (TSP). Rhode Island currently measures lead in PM-10, the fraction of TSP that is smaller than 10 microns. The highest 3-month average of lead in PM-10 at the Providence site in the most recent 3-year period, 2006-2008, was $0.0075 \mu\text{g}/\text{m}^3$, which is 5% of the NAAQS. Therefore, TSP lead levels would have to be 20 times higher the levels in PM-10 for the Providence site to violate the NAAQS.

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Rhode Island measured lead in both PM-10 and TSP at the Providence site in 2001 and 2002. During that time, 3-month average TSP lead levels were no more than twice the PM-10 lead levels. Therefore, it is very unlikely that Rhode Island will violate the new lead NAAQS, even when measurements of lead in TSP are initiated. Note also that no significant lead emissions sources have been identified in Rhode Island.

If you have any questions about this issue, please feel free to contact Barbara Morin at the Rhode Island Department of Environmental Management's Office of Air Resources at (401) 222-4700, extension 7012.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donald L. Carcieri".

Donald L. Carcieri
Governor