



STATE OF DELAWARE
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October 5, 2009

Mr. William C. Early (3RA00)
Acting Regional Administrator
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

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Mr. William C. Early (3RA00)

Dear Administrator Early:

On November 12, 2008, the EPA revised the primary and secondary National Ambient Air Quality Standards (NAAQS) for lead from the current 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), 24-hour average (averaged over one calendar quarter), to a new 0.15 $\mu\text{g}/\text{m}^3$ (quarterly average). Section 107(d) of the Clean Air Act (CAA) requires the Governor of each State to submit to the EPA a list of all areas (or portions thereof) in the State, designating each as nonattainment, attainment, or unclassifiable. This letter fulfills Delaware's obligations under Section 107(d) of the CAA.

Area Description and Attainment/Nonattainment Status

Delaware is composed of three counties, namely New Castle, Kent and Sussex, laying from north to south. The northern portion of New Castle County lies above the Chesapeake and Delaware Canal, a waterway that connects the Chesapeake Bay with the Delaware Bay. This part of New Castle County is more metropolitan and industrialized than the remainder of Delaware. The remainder of Delaware lies south of the Chesapeake and Delaware Canal, and comprises the southern portion of New Castle County, and all of Kent and Sussex Counties.

Lead monitoring in Delaware consists of historical Federal Reference Method (FRM) monitoring and non-FRM monitoring.

- Federal Reference Method (FRM) Lead Monitoring: Delaware operated two (2) lead monitoring sites between 1978 and 1988. The measured ambient lead concentrations at these sites decreased by approximately 94% during the time the sites were in operation,

due to the change to unleaded gasoline in cars. In 1989, 63% of the samples collected were below the analytical detection limits, and FRM lead monitoring was discontinued.

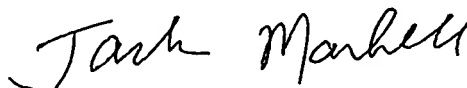
- **Non-FRM Lead Monitoring:** Since 1989 Delaware has ambient lead concentrations obtained from non-FRM method monitoring associated with fine particulate matter (PM_{2.5}) speciation and air toxics monitoring. This data indicates that lead concentrations in Delaware's air are on the order of 0.003 to 0.03 ug/m³; well below the 0.15 ug/m³ standard.

Recommendation

Under federal regulations only data collected with FRM or equivalent methods can be used to determine the attainment status relative to a NAAQS. Since no FRM or equivalent lead monitoring is conducted in Delaware, all three counties in Delaware should be designated as unclassifiable for both the primary and secondary lead NAAQS.

Thank you for your consideration of the above recommendations. If you have any questions concerning this submittal or would like to discuss it further, please contact Mr. Ali Mirzakhilili, the Administrator of our Air Quality Management Section, at (302)739-9402.

Sincerely,



Jack A. Markell
Governor

pc: Collin O'Mara
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