



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUN 15 2011

The Honorable Robert McDonnell
Governor of Virginia
Patrick Henry Building, Third Floor
1111 East Broad Street
Richmond, Virginia 23219

Dear Governor McDonnell:

Thank you for your recommendations on Virginia's air quality designations for the 2008 lead National Ambient Air Quality Standards (NAAQS). This letter is to notify you of the U.S. Environmental Protection Agency's (EPA) preliminary decision to designate all of Virginia as unclassifiable/attainment, and to inform you of our approach for completing the designations for the revised lead standards.

Reducing levels of lead pollution is an important part of EPA's commitment to a clean, healthy environment. Lead exposure can cause a range of adverse health effects, most notably in children. Exposures to low levels of lead early in life have been linked to adverse effects on intelligence quotient (IQ), learning, memory, and behavior.

On October 15, 2008, EPA substantially strengthened the health-based or "primary" NAAQS by lowering it from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) – a level set in 1978 – to a level of $0.15 \mu\text{g}/\text{m}^3$. This stronger standard provides increased protection against adverse health effects associated with exposure to lead in at-risk groups, including children. To provide increased protection against lead-related environmental and other welfare effects, EPA revised the secondary NAAQS to be identical in all respects to the revised primary standard. EPA also determined that the pre-existing ambient lead monitoring network was inadequate for determining whether many areas are meeting the revised lead standards and established new criteria for siting ambient lead monitors and new data collection requirements. Monitors meeting the new network siting requirements were to begin operation on January 1, 2010.

Within two years of promulgating new or revised NAAQS, the Clean Air Act (CAA) requires EPA to complete the initial process of identifying or designating areas that meet or do not meet an air quality standard. If the Administrator, or her designee, has insufficient information to make these designations, EPA has the authority to extend the designation process by up to one year. In light of the new monitoring network, EPA is completing the lead designations in two rounds. In the first round, published on November 16, 2010, EPA designated 16 areas as "nonattainment" for violating the 2008

lead NAAQS based on data from the pre-2010 monitoring network. For all other areas, the EPA extended the deadline for designations by up to one year so that data from the newly deployed monitors can be considered in making appropriate designation decisions. States were given an opportunity to update their recommendation letters for those remaining areas for our consideration in the second round of designations by December 15, 2010. The EPA intends to complete the second round of lead designations by no later than October 14, 2011.

Consistent with the CAA, and after carefully considering Virginia's October 15, 2009 recommendation letter and all the associated technical information for the 2008 lead NAAQS, including the most recent air quality data from 2008-2010, the EPA is proposing to designate Virginia as unclassifiable/attainment. The EPA uses this designation for initial designations to identify areas that have data indicating attainment, or where there is no evidence of a violation.

If your state has additional information that the EPA should consider with respect to our proposed modification to your designation recommendation, please submit it to us by August 15, 2011. EPA's preliminary designation decisions and supporting documentation will be made available to the general public for review. We will be accepting comments through August 15, 2011. EPA will review any information we receive from the Commonwealth of Virginia and the general public by this date, and we plan to promulgate the second round of final designations by October 14, 2011.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2008 lead NAAQS.

If you have any questions, please do not hesitate to contact me or have your staff contact Mrs. LaRonda Koffi, EPA's Virginia Liaison, at (215) 814-5374.

Sincerely,



Shawn M. Garvin
Regional Administrator

cc: Honorable Doug Domenech
Secretary of Natural Resources
Mr. David K. Paylor, Director
Virginia Department of Environmental Quality
Ms. Gina McCarthy, Assistant Administrator
for Air and Radiation