



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

June 14, 2010

The Honorable Benigno Fitial
Governor of the Commonwealth of the Northern Mariana Islands
Capitol Hill
Saipan, MP 96950

Dear Governor Fitial:

This letter is to inform you of the Environmental Protection Agency's (EPA's) approach for completing the designations for the revised National Ambient Air Quality Standards (NAAQS) for lead. As explained below, we intend to complete the designation process for the Commonwealth of the Northern Mariana Islands (CNMI) by October 15, 2011.

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 IQ, learning, memory and behavior.

On October 15, 2008, EPA substantially strengthened the NAAQS for lead. The new standards, set at 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), are 10 times tighter than the previous standards. In conjunction with strengthening the lead NAAQS, EPA also established new criteria for siting ambient lead monitors. The pre-existing ambient lead monitoring network was inadequate for determining whether many areas are meeting the revised lead NAAQS. Where required, monitors meeting the new network siting requirements were to begin operation by January 1, 2010.

The Clean Air Act (CAA) requires EPA to complete the initial designation process within two years of promulgating a new or revised NAAQS. If the Administrator 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, which will generate additional information in the upcoming year, EPA intends to complete the lead designations in two rounds. In the first round, to be completed by October 15, 2010, EPA is designating as "nonattainment" any area that is violating the 2008 lead NAAQS based on data from the pre-2010 monitoring network. For all other areas, EPA is extending the deadline for designations by up to one year so that data from the newly deployed monitors, where they are required, can be considered in making appropriate designation decisions. EPA will complete the second round of lead designations no later than October 15, 2011.

EPA is not intending to complete the initial area designations for CNMI at this time. Instead, EPA intends to designate CNMI by no later than October 15, 2011, in the second round of lead designations. If you would like to submit recommendations for your areas for our consideration in the second round of designations, we request that you do so by December 15, 2010. For the second round of designations, we will notify all states, territories, and tribes of our preliminary responses to their recommendations by no later than June 17, 2011.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2008 lead NAAQS. Should you have any questions, please do not hesitate to call me, or have your staff contact Deborah Jordan, Air Division Director, at 415-947-8715.

Sincerely,



Jared Blumenfeld
Regional Administrator

cc: Frank Rabauliman, Director, CNMI Department of Environmental Quality
Brian Bearden, Acting Manager, CNMI Department of Environmental Quality
Clean Air Branch