



THEODORE R. KULONGOSKI
Governor

October 13, 2009

Ms. Michelle L. Pirzadeh, Acting Regional Administrator
US Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: Recommendation for Designation of Lead Air Quality Areas

Dear Ms. Pirzadeh:

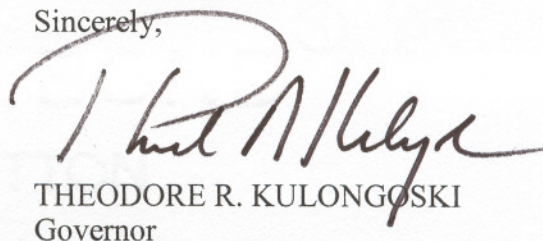
This letter provides my recommendation for attainment and nonattainment air quality designations in the State of Oregon for the revised Lead National Ambient Air Quality Standard (NAAQS) as required by Federal regulation, and requested by you.

The State of Oregon, with EPA's concurrence, discontinued all ambient air lead monitoring after 2001. This decision came after considering that no lead concentrations approaching the Standard had been measured for several years, and no increase in sources of lead emissions were anticipated. As a result, no ambient lead data, consistent with EPA's proposed new monitoring network siting criteria and data collection requirements is available anywhere in Oregon. This means there is insufficient data at this time to evaluate attainment of the more protective revised lead NAAQS. Therefore, I recommend that the entire State of Oregon be designated as Unclassifiable with respect to this Standard.

The State of Oregon is aware of the requirement to implement source-oriented ambient air lead monitoring by January 1, 2010, and will have that monitoring in place by that date. The recent addition of Section 105 Federal funds to the Department of Environmental Quality budget will make this possible. In addition, a population-oriented monitor will be operating in Portland, as required, by January 2011. Data acquired from these monitors will be used to determine attainment status.

If you have any questions, please contact David Collier, Manager, Air Quality Planning, Air Quality Division, Department of Environmental Quality, at (503) 229-5177.

Sincerely,



THEODORE R. KULONGOSKI
Governor

TRK:mc:jb