Government of the District of Columbia
Department of Health
Environmental Health Administration
Bureau of Environmental Quality
Air Quality Division

July 13, 2000

Judith M. Katz, Director
Air Protection Division
U.S. Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103

Dear Ms. Katz:

With respect to the District of Columbia's comments on the 8-hour ozone area designation, this is to confirm that the District is maintaining the position indicated in the letter of Mayor Anthony Williams submitted in June 1999.

If you need any further information on this matter, please call me at (202) 535-2255.

Sincerely,

Donald E. Wambsganss II
Program Manager

51 N Street, NE, 5th Floor, Washington, D.C. 20002-3323 Telephone: (202) 535-2250 Fax: (202) 535-1371

GOVERNMENT OF THE DISTRICT OF COLUMBIA
EXECUTIVE OFFICE
WASHINGTON, D.C. 20001

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JUN 29 1999
Air Protection Division (3AP00)

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

Dear Mr. McCabe:

Pursuant to Section 107(d)(1) of the Clean Air Action [42 U.S.C., §7407(d)(1)], as amended by Section 6103(a) of the Transportation Equity Act for the 21st Century (Public L. No. 105-178, §6103(a), 112 Stat. 107, 465 (1998)], I am writing to provide you with my recommendation for designation of the District of Columbia with respect to the revised National Ambient Air Quality Standard (NAAQS) for ozone and thereby comply with the requirement of making such designation within 2 years of the promulgation of the July 1997 NAAQS for ozone.

Designations for the 8-hour ozone NAAQS are based on the design values of individual ozone monitoring sites. The design value is defined as the 3-year average of the annual fourth-highest daily maximum 8-hour average ozone concentration. The 8-hour ozone NAAQS is met at an ozone monitoring site when the design value for that site is less than or equal to 0.08 parts per million (ppm).

The enclosed analysis of ozone ambient air quality monitoring data performed by the District's Air Quality Division shows that design values for all three ozone monitoring sites in the District exceed 0.08 ppm. Therefore, I am formally recommending that the entire District of Columbia be designated as a traditional nonattainment area for the 8-hour ozone NAAQS.

Sincerely,

Anthony A. Williams

Enclosure

DISTRICT OF COLUMBIA
ENVIRONMENTAL HEALTH ADMINISTRATION
Air Quality Division

8-Hour Ozone NAAQS Design Value Analysis

On July 18, 1997, the Environmental Protection Agency (EPA) issued revised National Ambient Air Quality Standards (NAAQS) for ozone. The EPA is phasing out and replacing the existing 1-hour ozone NAAQS with a new 8-hour standard to protect against longer exposure periods. The 8-hour ozone NAAQS is set at 0.08 parts per million (ppm) and is defined as a "concentration-based" form, specifically the 3-year average of the annual fourth-highest daily maximum 8-hour ozone concentration, also referred to as the "design value".

Pursuant to Section 107(d)(1) of the Clean Air Act (42 U.S.C., §7407(d)(1)), as amended by Section 6103(a) of the Transportation Equity Act for the 21st Century (Public L. No. 105-178, §6103(a), 112 Stat. 107, 465 (1998)), the Mayor of the District of Columbia is required to submit to the EPA a list of areas in the District recommended for designation as nonattainment, attainment, or unclassifiable with respect to the 8-hour NAAQS for ozone within 2 years of the promulgation of the July 1997 NAAQS for ozone.

Designations for the 8-hour ozone NAAQS are based on the design values of individual ozone monitoring sites. The highest design value among all sites in an area becomes the design value for that area. Areas with design values less than 0.085 ppm (the third decimal digit is rounded) are designated as attainment areas for the 8-hour ozone NAAQS, while areas with design values equal to or greater than 0.085 ppm are designated as nonattainment areas.

This design value analysis for the District of Columbia is based on ozone ambient air quality monitoring data for the years 1996-1998. During this period the District of Columbia's Air Quality Division operated 3 ozone ambient air quality monitoring sites: McMillan Reservoir-2500 1st Street N.W., Takoma Park Elementary School-Piney Branch & Dahlia Street N.W. and River Terrace Elementary School-34th & Dix Street N.E. Results of this analysis are presented in Tables 1-3. All 3 sites have design values equal to or greater than 0.085 ppm: McMillan Reservoir = 0.095 ppm, Takoma Park Elementary School = 0.092 ppm, and River Terrace Elementary School = 0.085 ppm. Therefore, the design value for the area is 0.095 ppm, and the entire District of Columbia should be designated as a nonattainment area for the 8-hour ozone NAAQS.