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Office of the Regional Administrator

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State of Rhode Island and Providence Plantations
State House
Providence, Rhode Island 02903-1196
401-222-2080

LINCOLN ALMOND
GOVERNOR

To: Sharon Reinker/Denise Garth
(919) 541-0804
From: Bob Judge
RI Letter...

July 12, 2000

Mindy Lubber, Regional Administrator
EPA – New England, Region I
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Ms. Lubber:

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990 (CAAA) Rhode Island is hereby submitting its recommendations for the designation of the State's attainment status for the eight-hour National Ambient Air Quality Standard (NAAQS) for ozone. This letter will supplement an earlier communication on this subject, which was submitted by my office in November 1999.

Section 107(d)(1) defines nonattainment areas as areas that do not meet, or that contribute to ambient air quality in a nearby area that does not meet the NAAQS for a pollutant. The entire State of Rhode Island meets that definition of nonattainment for the eight-hour ozone NAAQS. The NAAQS is clearly being exceeded at the West Greenwich, Kent County monitor and is likely to be exceeded at the Narragansett, Washington County monitors. The ozone concentrations recorded at the East Providence, Providence County monitor do not exceed the eight-hour NAAQS due to the localized destruction of ozone associated with urban nitrogen oxide emissions. However, emissions in the Providence metropolitan area clearly contribute to elevated ozone concentrations in downwind areas, including those recorded at the Easton, Massachusetts monitor, which are substantially higher than the eight-hour NAAQS.

EPA's guidance for establishing boundaries for 8-hour nonattainment areas, issued on 28 March 2000, states that Consolidated Metropolitan Statistical Areas (CMSAs) should be used as the presumptive boundaries of nonattainment areas. The Providence-Fall River-Warwick, RI-MA CMSA includes all of the municipalities in Providence, Kent and Bristol Counties, Rhode Island and some of the municipalities in Washington and Newport Counties, Rhode Island and Bristol County, Massachusetts.

For ease of administration, I am recommending that the Rhode Island eight-hour nonattainment area be defined as the entire State of Rhode Island, rather than as the CMSA. As such, the nonattainment area would differ from the presumptive boundaries in the following ways:

1. It would exclude the following municipalities in Bristol County, Massachusetts that are included in the Providence CMSA: Attleboro, Fall River, North Attleborough, Rehoboth, Seekonk, Swansea, and Westport;

2. It would include the municipalities of Middletown, Newport and Portsmouth in Bristol County, Rhode Island and New Shoreham in Washington County, Rhode Island. Those municipalities are not part of a CMSA; and

3. It would include the municipalities of Hopkinton and Westerly in Washington County, Rhode Island, which are part of the New London-Norwich, CT-RI CMSA.

I have attached a table showing the eight-hour ozone concentrations measured in the State. If you have any questions on this issue, please feel free to contact Barbara Morin at the Rhode Island Department of Environmental Management's Office of Air Resources at (401) 222-4700, extension 7012.

Sincerely,

Lincoln Almond
Governor

LA:jl
Enclosure

Table 1 Eight-Hour Average Ozone Concentrations in Rhode Island and Nearby Massachusetts
(3-year average of 4th high values –ppb)*

Site	1996 –1998 period	1997-1999 period
W. Greenwich, RI	90	92
Narragansett, RI	NA**	NA
E. Providence, RI	81	80
Easton, MA	88	88

* A site exceeds the eight-hour ozone NAAQS if the 3-year average of the 4th high ozone values at that site is greater than or equal to 85 ppb.

** Not applicable, site began operation in July 1997. The average of the 4th high eight hour ozone concentrations measured in the two years that this site has been operational (1998 and 1999) is 85 ppb.