

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

JUN 1 4 2010

The Honorable Joe Manchin III Governor of West Virginia 1900 Kanawha Blvd E. Charleston, West Virginia 25305

Dear Governor Manchin:

Thank you for your recommendations on air quality designations for the revised National Ambient Air Quality Standards (NAAQS) for lead throughout West Virginia. Reducing levels of lead pollution is an important part of the U.S. Environmental Protection Agency's (EPA) 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 effects on IQ, learning, memory and behavior. This letter is to notify you of EPA's response to West Virginia's designation recommendations, and to inform you of our approach in completing the designations for the revised lead NAAQS.

On October 15, 2008, EPA substantially strengthened the NAAQS for lead. The new standard, set at 0.15 micrograms per cubic meter ( $\mu g/m^3$ ), is 10 times more stringent than the previous standard. 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. Monitors meeting the new network siting requirements were to begin operation 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 in violation of 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 can be considered in making appropriate designation decisions. EPA will complete the second round of lead designations no later than October 15, 2011.

We have reviewed West Virginia's October 13, 2009 recommendation letter on air quality designations, which recommended a designation of "unclassifiable/attainment" for the entire state. EPA is not intending to complete the initial area designations for West Virginia at this time. Instead, in the second round of lead designations, EPA intends to evaluate new information and designate all areas in West Virginia by no later than October 15, 2011. If you would like to submit updated recommendations for West Virginia 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 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. If you have any questions, please do not hesitate to call me or have your staff contact Mrs. Jessica Greathouse, EPA's West Virginia Liaison, at 304-234-0275.

Sincerely,

Shawn M. Garvin

Regional Administrator

cc: Honorable Randy Huffman, Secretary
WV Department of Environmental Protection
Mr. John A. Benedict, Director, Division of Air Quality,
West Virginia Department of Environmental Protection
Ms. Gina McCarthy, EPA Assistant Administrator
for Air and Radiation
Mr. Steven D. Page, Director

EPA Office of Air Quality Planning and Standards