

PHILIP B. SCOTT
Governor



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State of Vermont
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OFFICE OF THE REGIONAL ADMINISTRATOR

April 21, 2017

Deborah Szaro
Acting Regional Administrator
EPA New England, Region 1
5 Post Office Square – Suite 100
Boston, MA 02109-3912

**Re: Vermont Designation Recommendations for the 2010 Revised Sulfur Dioxide
National Ambient Air Quality Standard**

Dear Ms. Szaro:

On behalf of the State of Vermont, I am submitting for consideration by the United States Environmental Protection Agency (EPA) the Designation Recommendation for Sulfur Dioxide: 2010 Primary National Ambient Air Quality Standard (*see enclosure*).

The Vermont Agency of Natural Resources is recommending that EPA designate the entire State of Vermont as attainment/unclassifiable for the 2010 Primary National Ambient Air Quality Standard for Sulfur Dioxide.

This letter fulfills the State's obligation mandated by Clean Air Act Section 107(d) to identify areas in Vermont and make recommendations for area designations following promulgation of new or revised national ambient air quality standards.

Should you have any questions regarding this submission, please contact Heidi Hales, Director of the Air Quality and Climate Division at (802) 828-1288.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Scott", written over a large, stylized, and somewhat abstract signature.

Philip B. Scott
Governor

Enclosure

cc: David Conroy, Air Programs Branch (EPA Region 1)
Anne Arnold, Air Quality Unit (EPA Region 1)
Heidi Hales, Air Quality and Climate Division (Vermont DEC)

Designation Recommendation for Sulfur Dioxide

2010 Primary National Ambient Air Quality Standard

April 2017



Air Quality and Climate Division
Montpelier, VT
P: 802-828-1288
F: 802-828-1250
anr.vermont.gov

Introduction

On June 2, 2010, the EPA established a revised primary sulfur dioxide (SO₂) National Ambient Air Quality Standard, or NAAQS, (75 FR 35520) while retaining the secondary standard. The primary standard was revised to a concentration of 75 parts per billion (ppb) in the form of the 99th percentile of 1-hour daily maximum concentrations, averaged over three years.

Under the schedule established by the consent order in *Sierra Club v. McCarthy* (N.D. Cal. 3:13-cv-3953-SI, March 2014), states must submit designation recommendations to the Environmental Protection Agency (EPA) by January 13, 2017. The EPA will promulgate final area designations for Vermont for the 2010 primary SO₂ NAAQS by December 31, 2017. While Vermont did not submit original designation recommendations in 2011, the State submits recommendations here based on updated SO₂ air quality data.

Vermont has no sources subject to the requirements of the SO₂ Data Requirements Rule for air quality characterization, therefore Vermont's SO₂ area designation recommendations are based solely on monitored ambient air quality concentrations.¹

Ambient Air Quality Monitoring

The State of Vermont monitors ambient air concentrations of SO₂ at two sites located in Rutland and Chittenden counties, in the towns of Rutland and Underhill, respectively. Design values for the primary 2010 SO₂ NAAQS were calculated from data collected at these sites over the 2011-2015 period. The design values at both sites attain the 75 ppb 2010 primary SO₂ NAAQS. The Rutland and Underhill design values for 2015 were 9 ppb and 2 ppb respectively (Table 1).

Table 1: Vermont Primary 1-hour SO₂ 2010 NAAQS Compliance Data.

Year	Rutland		Underhill	
	Annual 99 th percentile of 1-hour daily maximum concentrations	Design value (3-year average)	Annual 99 th percentile of 1-hour daily maximum concentrations	Design value (3-year average)
All values are in parts per billion (ppb)				
2011	27	-	6	-
2012	16	-	2	-
2013	10	18	3	4
2014	14	13	2	2
2015	2	9	3	2

Data were retrieved from the EPA Air Quality System (AQS) on November 3, 2016.

¹ Letter from Vermont Air Quality and Climate Division Director Heidi Hales to EPA Regional Administrator H. Curtis Spalding, "Negative Declaration for 40 CFR Part 51, Subpart BB - Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS," January 6, 2016.

Designation Recommendations

The observed concentrations for monitored SO₂ and the distribution of relatively small SO₂ sources in the state support that all counties in Vermont meet the SO₂ standards (Table 2).

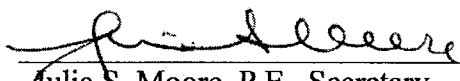
Therefore, in accordance with the requirements of the Clean Air Act Section 107(d) pertaining to area designations, we recommend the entire state of Vermont be designated as attainment/unclassifiable for the revised 2010 SO₂ NAAQS.

Table 2: State of Vermont Area Designation Recommendations Under Clean Air Act Section 107(d), 2010 Primary SO₂ NAAQS

POLLUTANT	DESIGNATED AREA (County)	-----DESIGNATIONS-----	
		NON- ATTAINMENT	ATTAINMENT/ UNCLASSIFIABLE
1-hour SO ₂	State of Vermont		X
1-hour SO ₂	Addison		X
1-hour SO ₂	Bennington		X
1-hour SO ₂	Caledonia		X
1-hour SO ₂	Chittenden		X
1-hour SO ₂	Essex		X
1-hour SO ₂	Franklin		X
1-hour SO ₂	Grand Isle		X
1-hour SO ₂	Lamoille		X
1-hour SO ₂	Orange		X
1-hour SO ₂	Orleans		X
1-hour SO ₂	Rutland		X
1-hour SO ₂	Washington		X
1-hour SO ₂	Windham		X
1-hour SO ₂	Windsor		X

Certification

I hereby certify that this document meets the requirements of Clean Air Act Section 107(d) by identifying areas of the State for designation as nonattainment, attainment, or unclassifiable with respect to the 2010 Primary National Ambient Air Quality Standards for Sulfur Dioxide.


 Julia S. Moore, P.E., Secretary
 Vermont Agency of Natural Resources

04/24/17
 Date

