

JAMES H. DOUGLAS  
Governor



State of Vermont  
OFFICE OF THE GOVERNOR

November 25, 2009

Ira W. Leighton  
Acting Regional Administrator  
EPA New England, Region 1  
1 Congress Street  
Suite 1100  
Boston, MA 02114-2023

**Re: VERMONT DESIGNATIONS FOR THE 2008 REVISED LEAD NATIONAL  
AMBIENT AIR QUALITY STANDARDS**

Dear Mr. Leighton:

In accordance with the requirements of the Clean Air Act (CAA) pertaining to area designations for the 2008 revised lead National Ambient Air Quality Standards (NAAQS), we recommend that the State of Vermont be designated as unclassifiable for the both the primary and secondary lead NAAQS. On October 15, 2008, the Environmental Protection Agency (EPA) revised the primary lead standard from a level of 1.5  $\mu\text{g}/\text{m}^3$  set in 1978, to a level of 0.15  $\mu\text{g}/\text{m}^3$  based on a quarterly averaging time.

As anticipated by the EPA, the State of Vermont does not have sufficient "quality assured, certified air quality data" available in the EPA's Air Quality System (AQS) to make a determination based on existing data. Therefore, as advised by the EPA, the State of Vermont has recommended that Vermont be designated as unclassifiable. However, for historical TSP and IMPROVE sampling data, please see the "Vermont Lead (Pb) NAAQS Monitoring Plan 2009" (<http://www.anr.state.vt.us/air/Monitoring/index.htm>).

This fulfills our obligation to identify areas in Vermont that have lead concentrations above the EPA's primary and secondary standards. If you have any questions, please don't hesitate to contact Richard Valentinetti at (802) 241-3860.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Douglas".

James H. Douglas  
Governor

cc: David Conroy, Air Programs Branch (EPA Region 1)  
Anne Arnold, Air Quality Unit (EPA Region 1)

Enclosures

STATE OF VERMONT  
 AREA DESIGNATIONS UNDER CLEAN AIR ACT (CAA) SECTION 107(D)  
 PRIMARY AND SECONDARY LEAD NAAQS

POLLUTANT	DESIGNATED AREA (COUNTY)	-----DESIGNATIONS-----		
		NON-ATTAINMENT	ATTAINMENT	UNCLASSIFIABLE
Lead	State of Vermont			X
<i>Lead</i>	<i>Addison</i>			<i>X</i>
<i>Lead</i>	<i>Bennington</i>			<i>X</i>
<i>Lead</i>	<i>Caledonia</i>			<i>X</i>
<i>Lead</i>	<i>Chittenden</i>			<i>X</i>
<i>Lead</i>	<i>Essex</i>			<i>X</i>
<i>Lead</i>	<i>Franklin</i>			<i>X</i>
<i>Lead</i>	<i>Grand Isle</i>			<i>X</i>
<i>Lead</i>	<i>Lamoille</i>			<i>X</i>
<i>Lead</i>	<i>Orange</i>			<i>X</i>
<i>Lead</i>	<i>Orleans</i>			<i>X</i>
<i>Lead</i>	<i>Rutland</i>			<i>X</i>
<i>Lead</i>	<i>Washington</i>			<i>X</i>
<i>Lead</i>	<i>Windham</i>			<i>X</i>
<i>Lead</i>	<i>Windsor</i>			<i>X</i>