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EPA, REGION III
OFFICE OF REGIONAL ADMINISTRATOR

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
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L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

October 15, 2009

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OCT 29 2009

3AP30

Mr. William C. Early
Acting Regional Administrator
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Early:

Pursuant to Section 107 (d) (1) (A) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I hereby submit the initial recommendations and comments on the designations of areas in Virginia under the 2008 National Ambient Air Quality Standard (NAAQS) for lead. Furthermore, this letter is in direct response to your September 15, 2009 letter to me that identified the requirement to submit these recommendations and the process to be followed.

The Department of Environmental Quality (DEQ) operated an ambient lead monitoring program from 1993 to 1998 under the 1978 lead standard. Ambient concentrations collected by this monitoring program were so far below the standard (two orders of magnitude) that further data collection specifically for lead was subsequently discontinued by the DEQ with EPA approval. Due to the discontinuation of this monitoring program, DEQ has no current lead monitoring data that meets the new EPA collection and analysis requirements for use in compliance determinations or area designations.

As a result, I respectfully request that all of Virginia be designated as "unclassifiable" under the new lead standard until sufficient monitoring data becomes available for designation determination purposes (see Enclosure I). These data should become available through the implementation of the ambient monitoring program required by the new standard.

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Director ()

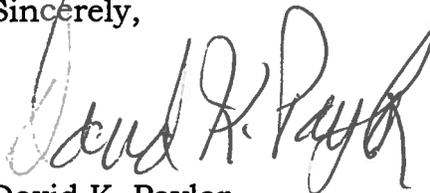
Although I am requesting a statewide unclassifiable designation at this time, I would also like to point out that DEQ does have unofficial monitoring data that strongly indicates compliance with the new lead standard:

- The Virginia urban air toxic network consists of monitors in the three largest urban areas in the Commonwealth (Northern Virginia, Richmond, and Hampton Roads). Data collected at these sites during 2006 to 2008 again indicate ambient lead concentrations that are well below the level of the new standard. These data are summarized in Enclosure II.
- Two special air toxics monitoring projects in Winchester and Hopewell have also produced lead data that are well below the standard.

Based on these data collection efforts and results, DEQ is confident that the new monitoring network, once in operation, will confirm standard compliance so that Virginia can be definitively designated attainment for the lead standard.

Thank you again for this opportunity to provide input on this important issue for Virginia. Please contact me if you have any questions concerning these recommendations.

Sincerely,



David K. Paylor

Enclosures

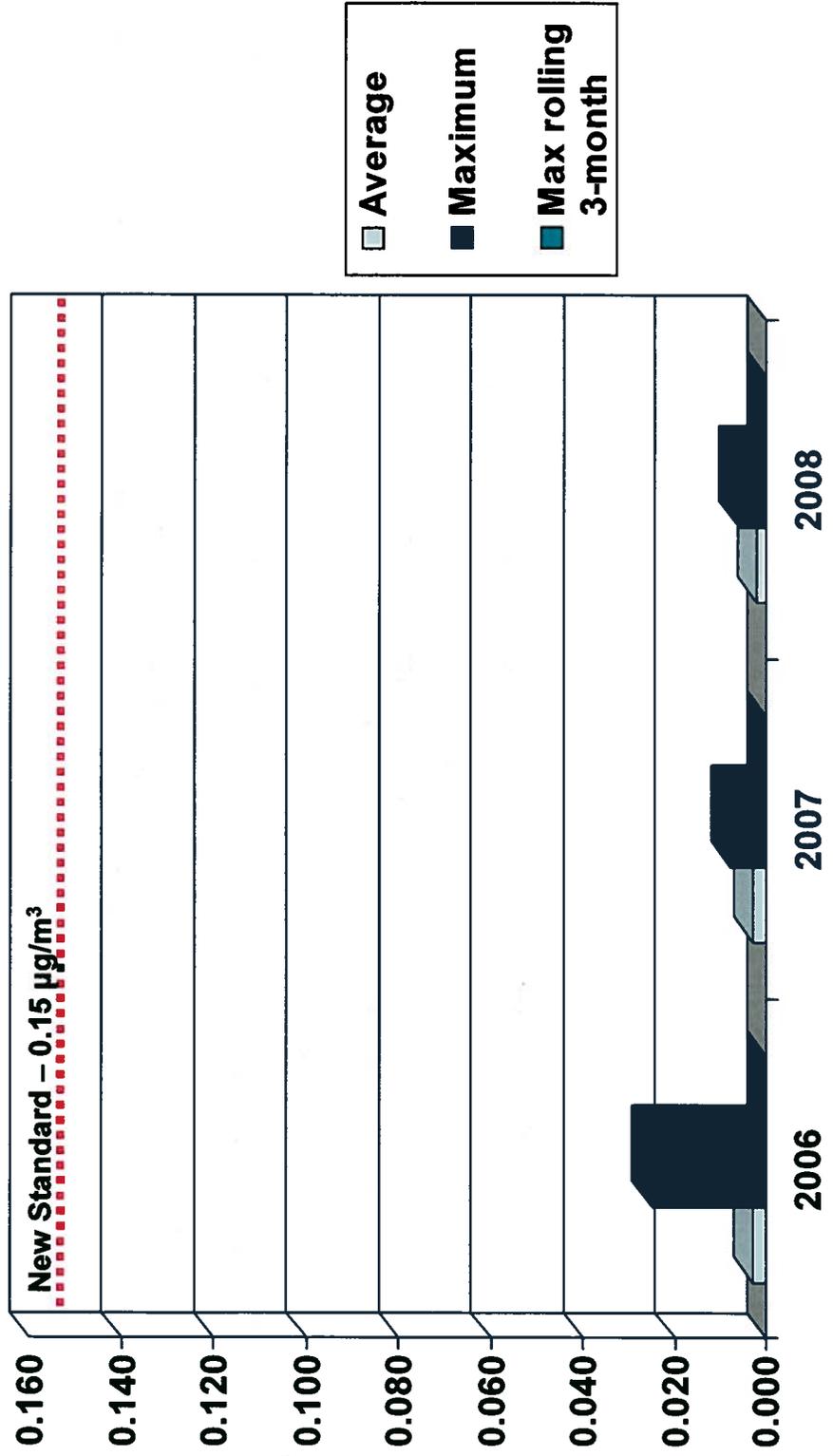
cc: L. Preston Bryant, Jr., Secretary of Natural Resources
Michael Dowd, DEQ Air Quality Division Director

ENCLOSURE II

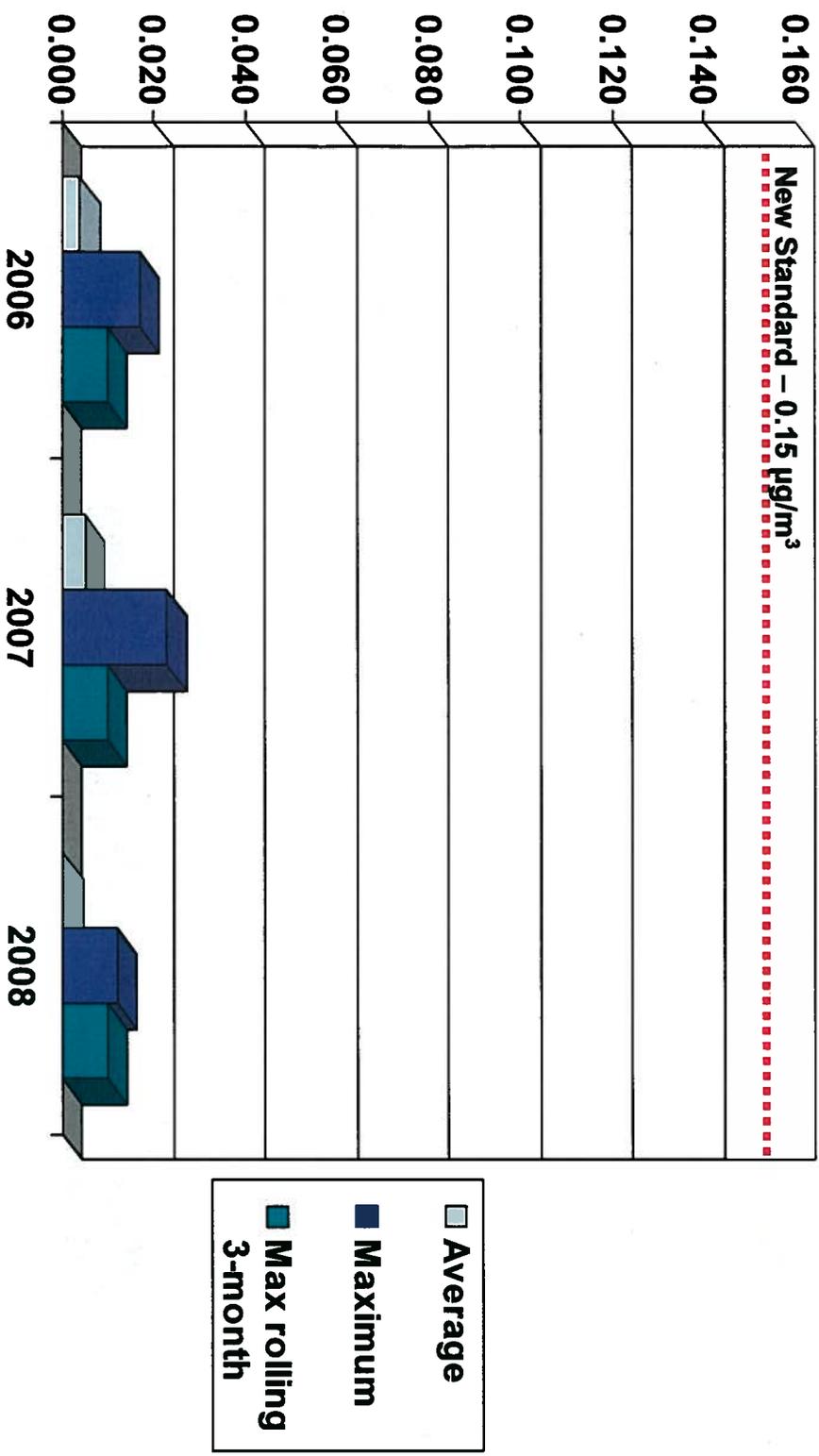
Ambient Lead Monitoring Data (2006-2008)

Pb-TSP Data, Urban Air Toxics Sites												
2006												
Sampling Site	Overall Average	Std Dev	Maximum sample	Maximum Rolling 3-mo. average	Overall Average	Std Dev	Maximum sample	Maximum Rolling 3-mo. average	Overall Average	Std Dev	Maximum sample	Maximum Rolling 3-mo. average
	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)
Fairfax	0.003	0.003	0.025	0.00	0.003	0.001	0.009	0.00	0.002	0.001	0.006	0.00
Richmond	0.004	0.002	0.017	0.01	0.005	0.004	0.023	0.01	0.003	0.001	0.012	0.01
Tidewater	0.004	0.002	0.013	0.00	0.003	0.002	0.015	0.01	0.003	0.001	0.008	0.00

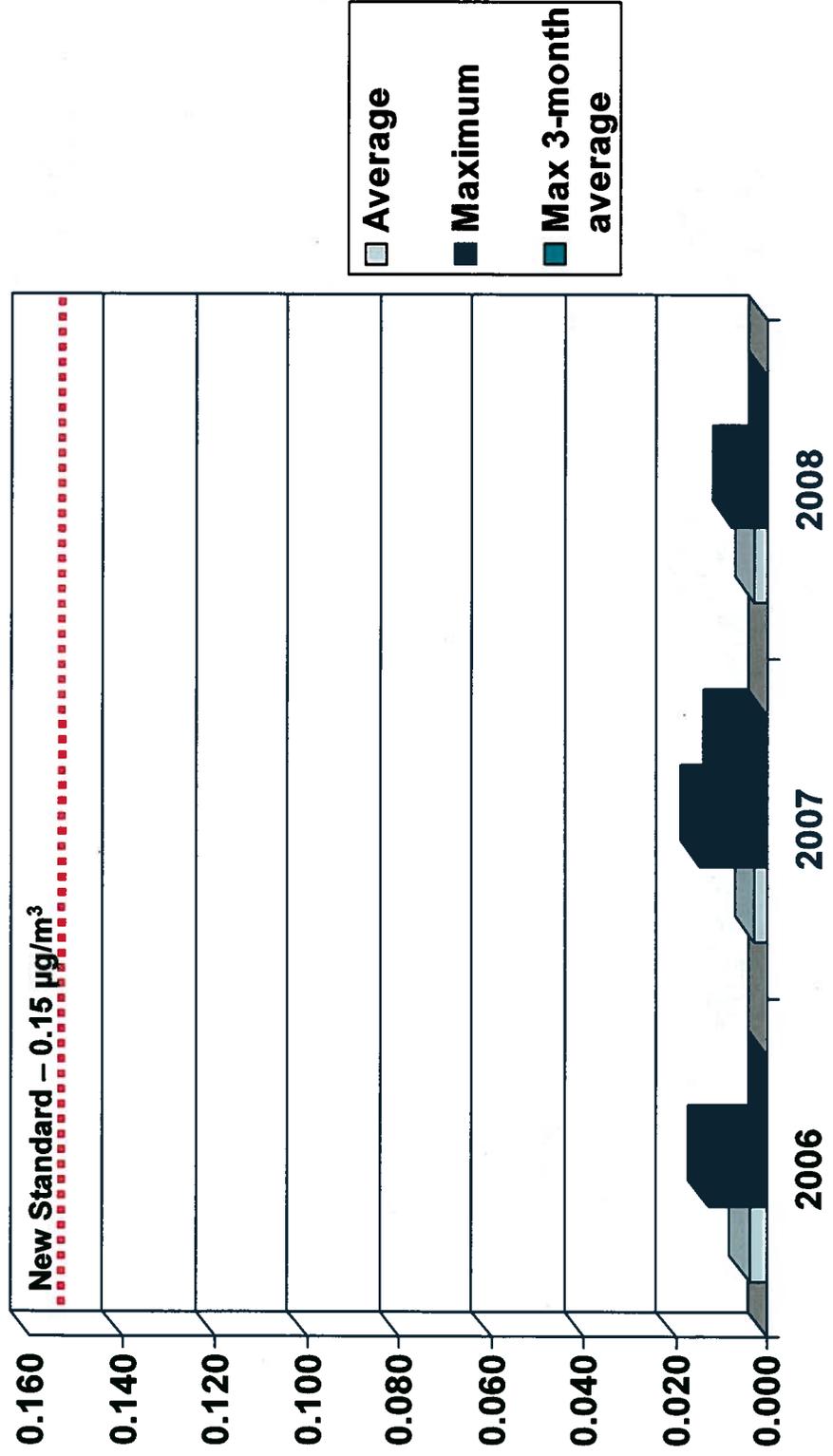
Fairfax (No. Virginia) Urban Air Toxics Site Lead Monitoring Data



Hopewell (Richmond MSA) Urban Air Toxics Site Lead Monitoring Data



Hampton Roads Urban Air Toxics Site Lead Monitoring Data



Enclosure I

§ 81.347 Virginia

Virginia-Lead

Designated Area	Designation	Classification
	Type	Type
Accomack County	Unclassifiable	
Albemarle County	Unclassifiable	
Alexandria	Unclassifiable	
Alleghany County	Unclassifiable	
Amelia County	Unclassifiable	
Amherst County	Unclassifiable	
Appomattox County	Unclassifiable	
Arlington County	Unclassifiable	
Augusta County	Unclassifiable	
Bath County	Unclassifiable	
Bedford	Unclassifiable	
Bedford County	Unclassifiable	
Bland County	Unclassifiable	
Botetourt County	Unclassifiable	
Bristol	Unclassifiable	
Brunswick County	Unclassifiable	
Buchanan County	Unclassifiable	
Buckingham County	Unclassifiable	
Buena Vista	Unclassifiable	
Campbell County	Unclassifiable	
Caroline County	Unclassifiable	
Carroll County	Unclassifiable	
Charles City County	Unclassifiable	
Charlotte County	Unclassifiable	
Charlottesville	Unclassifiable	
Chesapeake	Unclassifiable	
Chesterfield County	Unclassifiable	
Clarke County	Unclassifiable	
Clifton Forge	Unclassifiable	
Colonial Heights	Unclassifiable	
Covington	Unclassifiable	
Craig County	Unclassifiable	
Culpeper County	Unclassifiable	
Cumberland County	Unclassifiable	
Danville	Unclassifiable	
Dickenson County	Unclassifiable	

Dinwiddie County	Unclassifiable	
Emporia	Unclassifiable	
Essex County	Unclassifiable	
Fairfax	Unclassifiable	
Fairfax County	Unclassifiable	
Falls Church	Unclassifiable	
Fauquier County	Unclassifiable	
Floyd County	Unclassifiable	
Fluvanna County	Unclassifiable	
Franklin	Unclassifiable	
Franklin County	Unclassifiable	
Frederick County	Unclassifiable	
Fredericksburg	Unclassifiable	
Galax	Unclassifiable	
Giles County	Unclassifiable	
Gloucester County	Unclassifiable	
Goochland County	Unclassifiable	
Grayson County	Unclassifiable	
Greene County	Unclassifiable	
Greensville County	Unclassifiable	
Halifax County	Unclassifiable	
Hampton	Unclassifiable	
Hanover County	Unclassifiable	
Harrisonburg	Unclassifiable	
Henrico County	Unclassifiable	
Henry County	Unclassifiable	
Highland County	Unclassifiable	
Hopewell	Unclassifiable	
Isle Of Wight County	Unclassifiable	
James City County	Unclassifiable	
King And Queen County	Unclassifiable	
King George County	Unclassifiable	
King William County	Unclassifiable	
Lancaster County	Unclassifiable	
Lee County	Unclassifiable	
Lexington	Unclassifiable	
Louisa County	Unclassifiable	
Loudoun County	Unclassifiable	
Lunenburg County	Unclassifiable	
Lynchburg	Unclassifiable	
Madison County	Unclassifiable	
Manassas	Unclassifiable	
Manassas Park	Unclassifiable	
Martinsville	Unclassifiable	
Mathews County	Unclassifiable	
Mecklenburg County	Unclassifiable	
Middlesex County	Unclassifiable	

Montgomery County	Unclassifiable	
Nelson County	Unclassifiable	
New Kent County	Unclassifiable	
Newport News	Unclassifiable	
Norfolk	Unclassifiable	
Northampton County	Unclassifiable	
Northumberland County	Unclassifiable	
Norton	Unclassifiable	
Nottoway County	Unclassifiable	
Orange County	Unclassifiable	
Page County	Unclassifiable	
Patrick County	Unclassifiable	
Petersburg	Unclassifiable	
Pittsylvania County	Unclassifiable	
Poquoson	Unclassifiable	
Portsmouth	Unclassifiable	
Powhatan County	Unclassifiable	
Prince Edward County	Unclassifiable	
Prince George County	Unclassifiable	
Prince William County	Unclassifiable	
Pulaski County	Unclassifiable	
Radford	Unclassifiable	
Rappahannock County	Unclassifiable	
Richmond	Unclassifiable	
Richmond County	Unclassifiable	
Roanoke	Unclassifiable	
Roanoke County	Unclassifiable	
Rockbridge County	Unclassifiable	
Rockingham County	Unclassifiable	
Russell County	Unclassifiable	
Salem	Unclassifiable	
Scott County	Unclassifiable	
Shenandoah County	Unclassifiable	
Smyth County	Unclassifiable	
South Boston	Unclassifiable	
Southampton County	Unclassifiable	
Spotsylvania County	Unclassifiable	
Stafford County	Unclassifiable	
Staunton	Unclassifiable	
Suffolk	Unclassifiable	
Surry County	Unclassifiable	
Sussex County	Unclassifiable	
Tazewell County	Unclassifiable	
Virginia Beach	Unclassifiable	
Warren County	Unclassifiable	
Washington County	Unclassifiable	
Waynesboro	Unclassifiable	

Westmoreland County Williamsburg Winchester Wise County Wythe County York County	Unclassifiable Unclassifiable Unclassifiable Unclassifiable Unclassifiable	
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