



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jeff Kotkamp
Lt. Governor

Mini A. Drew
Secretary

December 20, 2010

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U.S. Environmental Protection Agency - Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

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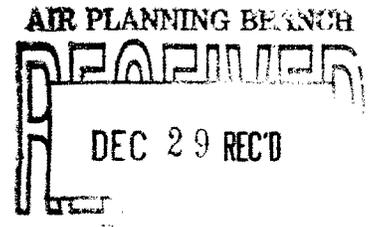
**DIVISION OF AIR
RESOURCE MANAGEMENT**

Dear Administrator Fleming:

I am responding to your November 12, 2010, letter to Florida Governor Charlie Crist requesting recommendations for the designation of "attainment," "nonattainment," or "unclassifiable" areas in Florida with respect to the 2010 revised national ambient air quality standard (NAAQS) for nitrogen dioxide (NO₂).

Florida currently operates 12 NO₂ monitors located in urban areas throughout the state. As referenced in your letter, U.S. Environmental Protection Agency (EPA) regulations require that Florida deploy additional NO₂ monitors to be located near roadsides or near communities. Sufficient data from these new monitors will not be available for the determination on attainment status until as late as after 2015. Thus, our immediate recommendation is based on the existing data for the complete three-year period 2007-2009. Data for the three-year period through 2010 are still being collected, but available data are consistent with the 2007-2009 period. These data show that all existing monitors are in compliance with both the annual and the new 1-hour NO₂ NAAQS.

In your letter, you indicate that absent the new roadside monitors, you expect to classify most areas as "unclassifiable" unless existing data show noncompliance with the standards. We note that current areas in the state that are unclassifiable or attainment are designated as "unclassifiable/attainment." Given that all data currently available indicates that neither the annual nor the 1-hour standard is violated, we believe the designation of unclassifiable/attainment is a more accurate representation of Florida's status. Thus, based on the current data, we recommend that the entire state, as a single area, be classified as unclassifiable/attainment. The request for a single area is to be consistent with the way the state currently establishes baseline areas for prevention of significant deterioration (PSD) purposes.



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Thank you for your continued support of our efforts to fully implement the Clean Air Act in Florida. If you have any questions about this recommendation, please contact Joseph Kahn, Director of DEP's Division of Air Resource Management, at (850) 488-0114.

Sincerely,

A handwritten signature in cursive script that reads "Mimi A. Drew".

Mimi A. Drew
Secretary

cc: Geof Mansfield, Acting Deputy Secretary, Regulatory Programs, DEP
Joseph Kahn, Director, Division of Air Resource Management, DEP
Richard Schutt, Chief, Air Planning Branch, EPA, Region 4