



Brad Henry
Governor

September 29, 2009

Mr. Larry Starfield
Acting Regional Administrator, Region 6
Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Subject: Oklahoma's Designation Recommendation for the 2008 Revised Lead NAAQS

Dear Mr. Starfield:

On behalf of the State of Oklahoma, thank you for the opportunity to provide Oklahoma's recommendation for initial designations under the revised National Ambient Air Quality Standards (NAAQS) for lead. I am aware that on October 15, 2008 the U.S. Environmental Protection Agency (EPA) tightened the primary and secondary lead NAAQS to better protect public health and the environment and that states are to submit their recommendations for designations to EPA no later than October 15, 2009.

Recommendations are to be based on the most recent three consecutive years of quality-assured, certified air quality lead monitoring data. The last year the Department of Environmental Quality (DEQ) collected data meeting these qualifications was 1997. Over a decade ago, EPA approved the discontinuation of lead monitoring in Oklahoma. This was done after many years of monitoring low ambient concentrations. Although DEQ monitors lead in ambient air under its air toxics program using an EPA-endorsed method of sample analysis, EPA Region 6 staff advised the DEQ that these data do not meet the requirements for use in this designation. No other data are available.

In accordance with section 107(d)(1)(A) of the federal Clean Air Act, it is my recommendation that the entire State of Oklahoma be designated as unclassifiable for the 2008 revised primary and secondary lead NAAQS.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Henry".

Brad Henry
Governor

cc: J.D. Strong, Secretary of Environment