

PHILIP B. SCOTT
GOVERNOR



State of Vermont
OFFICE OF THE GOVERNOR

May 28, 2025

Mark Sanborn, Regional Administrator
EPA Region 1, New England
5 Post Office Square - Suite 100
Boston, MA 02109-3912

Re: Vermont Designation for the 2024 Revised Annual Particulate Matter National Ambient Air Quality Standard

Dear Mr. Sanborn:

In accordance with requirements of the Clean Air Act pertaining to area designations for the 2024 revised primary annual Particulate Matter (PM_{2.5}) National Ambient Air Quality Standards (NAAQS) promulgated on February 7, 2024, we are pleased to recommend that the State of Vermont be designated as attainment/unclassifiable.

The State of Vermont has sufficient measurement data from approved federal reference method monitors to calculate 2021-2023 annual PM_{2.5} design values for three of the State's largest population centers (Burlington, Rutland, and Bennington) as well as from a rural background site in Underhill. These data, summarized in Table 1 below, indicate that all Vermont monitors had three-year 2021-2023 design values below the revised 2024 annual PM_{2.5} NAAQS of 9.0 micrograms per cubic meter (µg/m³) at any Vermont site in any of the past 10 years.

Concentrations at all sites generally declined through 2018. From 2018 to present, PM_{2.5} design values changed little for Rutland and Bennington but increased in Burlington and Underhill. The largest increase occurred in Burlington where the design value rose from 5.2 to 6.4 µg/m³ in the 2018-2023 period. Canadian wildfire smoke in 2023 impacted southern and northern sites such as Bennington, Burlington, and Underhill more than centrally located Rutland. Vermont has not submitted exceptional event demonstrations to request those data be excluded from design value calculations due to the lack of regulatory significance (i.e., an effect on NAAQS designations). As a result, relatively high 2023 annual averages will continue to be reflected in design values until 2026. Nevertheless, design values are in attainment of the 2024 PM_{2.5} NAAQS.

Recently, in 2023 and 2024, ambient air quality monitoring has been a challenge in Vermont's most populous region in and around Burlington. The Cherry Street location was discontinued in

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June 2023 following planned resource-saving measures and the South Winooski Avenue site was forced to relocate when construction began on its site in February 2024. Locating a new site was difficult, but monitoring is expected to resume in Burlington by summer 2025. The last year Cherry Street had a valid design value year was 2014 and the site was not running a PM monitor in the 2019-2021 period, but measurements that were collected all indicate the site is in attainment of the 2024 PM_{2.5} NAAQS. The South Winooski Avenue site was not in operation for most of 2024, but all three previous design value years are complete and valid and in attainment of the 2024 PM_{2.5} NAAQS.

Based on these measurements and trends, Vermont recommends that all sections of the State be designated as attainment/unclassifiable, as indicated in Table 2 below. This fulfills our obligations under the Clean Air Act Section 107(d), to identify any areas in Vermont that have concentrations above the 2024 primary annual PM_{2.5} NAAQS. If you have any questions, please don't hesitate to contact Heidi Hales at 802-828-1288.

Sincerely,



Philip B. Scott
Governor

PBS/kp

cc: Lynn Hamjian (Air & Radiation Division Director, EPA Region 1)
Eric Wortman (Air Quality Branch Manager, EPA Region 1)

Table 1: PM_{2.5} design values at Vermont monitoring sites, 2014-2024. Units are micrograms per cubic meter (µg/m³). Note that data for 2024 are preliminary and subject to change during validation.

Year	Bennington	Burlington	Rutland	Underhill
2024	5.3	6.6	6.7	4.4
2023	5.4	6.4	6.7	4.4
2022	4.9	5.9	6.5	3.9
2021	4.8	5.8	6.5	3.8
2020	4.8	5.6	6.5	3.7
2019	4.8	5.3	6.5	3.7
2018	4.9	5.2	6.4	3.3
2017	5.4	5.5	7.3	3.2
2016	5.8	6	8.1	3.3
2015	6.2	6.3	8.7	4
2014	6.3	6.3	8.6	4.4

Table 2: State of Vermont area designations under Clean Air Act Section 107(d) primary annual fine particulate matter (PM_{2.5}) National Ambient Air Quality Standard.

POLLUTANT	DESIGNATED AREA (COUNTY)	-----DESIGNATIONS-----	
		NON-ATTAINMENT	ATTAINMENT/ UNCLASSIFIABLE
Annual PM _{2.5}	State of Vermont		X
Annual PM _{2.5}	<i>Addison</i>		X
Annual PM _{2.5}	<i>Bennington</i>		X
Annual PM _{2.5}	<i>Caledonia</i>		X
Annual PM _{2.5}	<i>Chittenden</i>		X
Annual PM _{2.5}	<i>Essex</i>		X
Annual PM _{2.5}	<i>Franklin</i>		X
Annual PM _{2.5}	<i>Grand Isle</i>		X
Annual PM _{2.5}	<i>Lamoille</i>		X
Annual PM _{2.5}	<i>Orange</i>		X
Annual PM _{2.5}	<i>Orleans</i>		X
Annual PM _{2.5}	<i>Rutland</i>		X
Annual PM _{2.5}	<i>Washington</i>		X
Annual PM _{2.5}	<i>Windham</i>		X
Annual PM _{2.5}	<i>Windsor</i>		X