

LANCE R. LEFLEUR
DIRECTOR



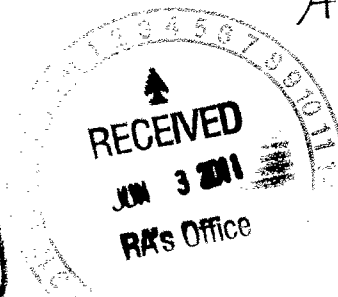
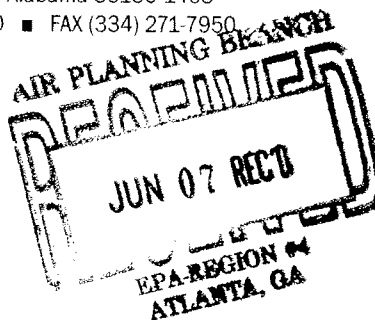
ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

May 25, 2011

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



Dear Ms. Fleming:

As the designee of the Governor of the State of Alabama, I am providing this response to your letter of 28 March, which requests the State's recommendations regarding the extent of non-attainment areas for the 1-hour sulfur dioxide (SO₂) air quality standard.

Currently, there is only one SO₂ monitor in the State's air quality monitoring network. It is located in Fairfield, and is operated by the Jefferson County Department of Health (JCDH). This monitor currently reads concentrations well below the 1-hour SO₂ NAAQS of 75 ppb. We are pleased that this monitor, located in an area that is urbanized and also heavily industrialized, measures such low concentrations.

However, we do believe that several small-scale areas of the State will be identified as having SO₂ levels above the new standard, assuming that EPA carries through with its proposal that modeling be used extensively to determine attainment status. We anticipate that corrective action for these areas will be achieved through compliance schedules and emission limits mandated by enforceable permit changes, rather than by the traditional route of regulation revisions.

It is apparent that the 40-year old practices of the Clean Air Act, where non-attainment areas are relatively large and the "fix" for these areas involves emissions reductions from multiple sources and source types, is unworkable for short-term NAAQS where the emissions sources causing high concentrations are localized and easily identifiable. For this reason, ADEM asks that EPA declare the entire State as attainment. ADEM will take steps to identify the areas indicated as having high SO₂

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



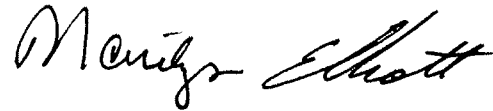
Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)

concentrations, and will make the permit changes which are needed to lower concentrations to necessary levels.

Should you require additional information, please contact Mr. Ron Gore of the Air Division at 334-271-7868.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance R. LeFleur". The signature is written in a cursive style with a large initial 'L' and 'R'.

Lance R. LeFleur

Director

CC:
Wayne Studyvin, JCDH
Danny Shea, City of Huntsville

LRL/lbb