



RECEIVED

APR 28 2011

MARTIN O'MALLEY  
GOVERNOR

EPA, REGION III  
OFFICE OF REGIONAL ADMINISTRATOR

STATE HOUSE  
100 STATE CIRCLE  
ANNAPOLIS, MARYLAND 21401-1925  
(410) 974-3901  
(TOLL FREE) 1-800-811-8336

TTY USERS CALL VIA MD RELAY

April 19, 2011

Mr. Shawn M. Garvin  
Regional Administrator  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street (3RA00)  
Philadelphia PA 19103-2023

RECEIVED

MAY 10 2011

3AP30

Dear Mr. Garvin:

Thank you for the opportunity to present the Environmental Protection Agency (EPA) with recommendations for designation of Maryland's counties under the revised primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). In accordance with §107(d)(1) of the Clean Air Act, Maryland's recommendations for attainment, nonattainment, and unclassifiable areas under the new 1-hour primary SO<sub>2</sub> standard are provided below in the table.

Maryland recommends that EPA designate all of Maryland as unclassifiable with respect to the new standard. Based upon the preliminary 2010 1-hour SO<sub>2</sub> design values from Maryland's air quality monitoring network, no counties in Maryland violate the new 1-hour primary SO<sub>2</sub> standard of 75 parts per billion (ppb). We believe these preliminary data are correct, and we expect to finalize them by May 2011. Maryland has not, however, conducted refined air quality dispersion modeling that confirms the monitoring results.

Based on EPA's revisions to the SO<sub>2</sub> monitoring rule, Maryland will be required to site two SO<sub>2</sub> monitors within the Baltimore-Towson, MD Core-Based Statistical Area (CBSA), three monitors in the Washington, DC CBSA and two monitors in the Philadelphia CBSA. The Washington, DC CBSA and Philadelphia CBSA already have the required monitors. Within the Baltimore-Towson, MD CBSA the Essex monitoring site in Baltimore County meets the new monitoring requirements, and we will propose a second monitoring site in the ambient air monitoring network plan for 2012.

The table below summarizes the specific counties that Maryland is recommending be designated as unclassifiable control region areas.


<u>Designated Area</u>	<u>Designation</u>
Allegany County	Unclassifiable
Anne Arundel County	Unclassifiable
Baltimore City	Unclassifiable
Baltimore County	Unclassifiable
Calvert County	Unclassifiable

<u>Designated Area</u>	<u>Designation</u>
Caroline County	Unclassifiable
Carroll County	Unclassifiable
Cecil County	Unclassifiable
Charles County	Unclassifiable
Dorchester County	Unclassifiable
Frederick County	Unclassifiable
Garrett County	Unclassifiable
Harford County	Unclassifiable
Howard County	Unclassifiable
Kent County	Unclassifiable
Montgomery County	Unclassifiable
Prince George's County	Unclassifiable
Queen Anne's County	Unclassifiable
Somerset County	Unclassifiable
St. Mary's County	Unclassifiable
Talbot County	Unclassifiable
Washington County	Unclassifiable
Wicomico County	Unclassifiable
Worcester County	Unclassifiable

Maryland recognizes that this recommendation submittal is only the first step in the SO<sub>2</sub> designation process, and looks forward to working with the EPA and Maryland stakeholders during the final steps of the designation process.

If you have any questions about this submission, please do not hesitate to contact Robert M. Summers, Ph.D., Acting Secretary, Maryland Department of the Environment at (410) 537-3084 or George (Tad) Aburn, Director of the Air and Radiation Management Administration at (410) 537-3255.

Sincerely,



Governor

cc: Robert M. Summers, Acting Secretary  
George (Tad) Aburn, Director, Air and Radiation Management Administration