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EPA, REGION III  
OFFICE OF REGIONAL ADMINISTRATOR

**ADRIAN M. FENTY**  
MAYOR

October 15, 2009

William C. Early  
Acting Regional Administrator  
U.S. Environmental Protection Agency, Region III  
Mail Code 3RA00  
1650 Arch Street  
Philadelphia, PA 19103

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OCT 29 2009

Division Director (3AP00)

Subject: Recommendation to EPA to Designate the District as an "Unclassifiable" Area for the 2008 Revised Lead NAAQS

Dear Mr. Early,

On behalf of the District of Columbia (District), I thank you for the opportunity to make a recommendation for the ambient lead 2008 National Ambient Air Quality Standards (NAAQS) attainment status in the District. The existing monitoring in the District does meet the requirements of the revised ambient lead NAAQS final rulemaking (73 FR 66964; November 12, 2008). To meet the population-based requirements of the 2008 lead NAAQS, the District must establish Federal Reference Method (FRM) ambient lead monitoring stations that will be operational by January 1, 2011. Hence, in accordance with Section 107(d)(1) of the Clean Air Act and the U.S. Environmental Protection Agency (EPA) guidance memorandum dated August 21, 2009, I am recommending that the District be designated as an "*unclassifiable*" area under the 2008 lead NAAQS.

EPA revised the ambient lead air quality standards in 2008 and set the NAAQS at 0.15 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to protect public health and the environment. The 2008 lead NAAQS are ten times more stringent than the 1978 lead NAAQS of  $1.5 \mu\text{g}/\text{m}^3$ . The 2008 NAAQS require ambient lead monitoring with total suspended particulate matter based ambient lead (Pb-TSP) FRM monitors.

Ambient lead monitoring in the District, with EPA-approved FRM monitors, began in the 1960s. It was discontinued in December 2001 in consultation with EPA when the monitored ambient lead concentrations were consistently well below the 1978 lead NAAQS ( $1.5 \mu\text{g}/\text{m}^3$ ). For example, the design value in the District for the 1998 to 1999 period was  $0.03 \mu\text{g}/\text{m}^3$ ; this concentration was about two percent of the 1978 NAAQS.

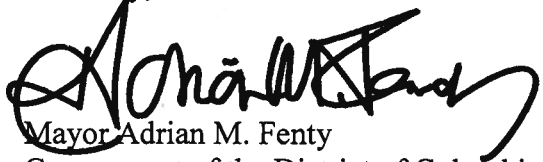
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During 2001 and 2002, the District established a Chemical Speciation Network (CSN) monitor for measuring chemical species of fine particulate matter (PM<sub>2.5</sub>) pollution, and National Air Toxics Trends Station (NATTS) monitors for measuring air toxics, including ambient lead. These monitoring networks are based on air sampling of particulate matter pollution of 2.5 microns (PM<sub>2.5</sub>) and 10 microns (PM<sub>10</sub>) in diameter. Recent data from the District's CSN and NATTS monitors indicate ambient lead concentrations in the range of 0.01 µg/m<sup>3</sup>. However, the CSN and NATTS methodologies are different from the Pb-TSP FRM sampling required for the new 2008 lead NAAQS, and thus are not approved by EPA for making an attainment determination.

In summary, even though existing monitoring data indicate that the District is likely in attainment, based on EPA's criteria and guidance, I am recommending that EPA designate the District's status for the new 2008 lead NAAQS as "unclassifiable." The District plans to operate population-based ambient lead monitors by January 1, 2011, in order to meet the monitoring requirements of the 2008 lead NAAQS. We anticipate sufficient federal resources to establish and maintain lead monitoring in the District.

Should you require additional information on this matter, please contact Ms Cecily Beall, Associate Director for the Air Quality Division of the District Department of the Environment, at (202) 535-2626.

Sincerely,



Mayor Adrian M. Fenty  
Government of the District of Columbia

cc: Judy Katz, Director, Air Protection Division, EPA Region III  
George S. Hawkins, Director, District Department of the Environment  
Cecily Beall, Associate Director, Air Quality Division, DDOE