

Eagan, Minnesota Technical Support Document

Definition of important terms used in this document:

- 1) **Designated “unclassifiable”** – an area where EPA could not determine if there was a violation of the 2008 Lead NAAQS or a contribution to a violation in a nearby area, because there was insufficient air quality data for both 2006-2008 and 2007-2009 and where additional monitoring data for 2010 could not result in a different designation.
- 2) **Designated “attainment”** – an area which EPA has determined, based on the most recent 3 years of certified air quality data from 2006-2008 or 2007-2009, has no violations of the 2008 lead NAAQS during 36 consecutive valid 3-month site means; and which EPA has further determined does not contribute to a violation of the 2008 lead NAAQS in a nearby area and that additional monitoring data from 2010 could not result in a different designation.
- 3) **Designated “nonattainment” area** – an area which EPA has determined, based on a State recommendation and/or on the technical analysis included in this document, has a violation of the 2008 lead NAAQS during the most recent 3 consecutive years of quality-assured, certified air quality data.
- 4) **Prior nonattainment area** – an area that is currently designated as nonattainment or maintenance for the 1978 lead NAAQS (including both current nonattainment areas and maintenance areas).
- 5) **Recommended nonattainment area** – an area a State or Tribe has recommended to EPA be designated as nonattainment.
- 6) **Violating monitor** – an ambient air monitor whose design value exceeds 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). As described in Appendix R of part 50, a violation can be based on either Pb-TSP or Pb-PM10 data and only 3 months of data are necessary to produce a valid violating design value.
- 7) **1978 lead NAAQS** – $1.5 \mu\text{g}/\text{m}^3$, National Ambient Air Quality Standard for lead promulgated in 1978. Based on Pb-TSP indicator and averaged over a calendar quarter.
- 8) **2008 lead NAAQS** – $0.15 \mu\text{g}/\text{m}^3$, National Ambient Air Quality Standard for lead promulgated in 2008. Based on Pb-TSP indicator and a 3-month rolling average. Pb-PM10 data may be used in limited instances, including to show nonattainment.

**MINNESOTA
Area Designations For the
2008 Lead National Ambient Air Quality Standards**

EPA has revised the level of the primary (health-based) standard from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 0.15 $\mu\text{g}/\text{m}^3$ measured as total suspended particles (TSP). EPA has revised the secondary (welfare-based) standard to be identical in all respects to the primary standard.

Pursuant to section 107(d) of the Clean Air Act, EPA must designate as “nonattainment” those areas that violate the NAAQS and those nearby areas that contribute to violations. The table below identifies the partial county in Minnesota that EPA intends to designate “nonattainment” for the 2008 lead National Ambient Air Quality Standard (2008 lead NAAQS).

Area (listed alphabetically)	Minnesota Recommended Nonattainment Counties	EPA’s Designated Nonattainment Counties	Nonattainment Area for 1978 Lead NAAQS
Eagan	Dakota (partial)	Dakota (partial)	Eagan (partial)

Table 1: Minnesota Nonattainment Area for the 2008 Lead NAAQS

Technical Analysis for Eagan

Introduction

This technical analysis for Eagan identifies the partial county with a monitor that violates the 2008 lead NAAQS and evaluates nearby counties for contributions to lead concentrations in the area. EPA has evaluated these counties based on the weight of evidence of the following factors recommended in previous EPA guidance:

- Air quality in potentially included versus excluded areas;
- Emissions and emissions-related data in areas potentially included versus excluded from the nonattainment area, including population data, growth rates, and patterns and emissions controls;
- Meteorology (weather/transport patterns);
- Geography/topography (mountain ranges or other air basin boundaries);
- Jurisdictional boundaries (e.g., counties, air districts, reservations, etc.); and
- Any other relevant information submitted to or collected by EPA (e.g., modeling where done appropriately).

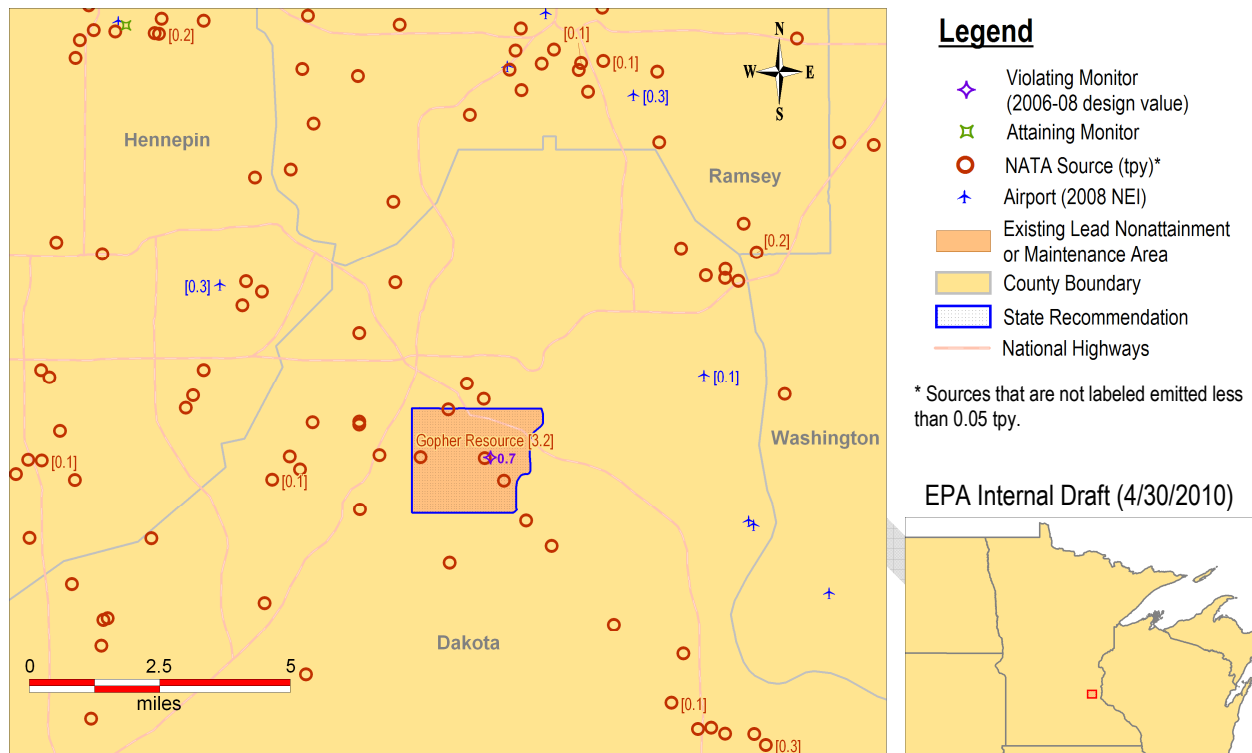


Figure 1: Eagan, Minnesota State Recommended Nonattainment Area (Office of Air Quality and Planning Standards - OAQPS)

Figure 1 is a map of the area analyzed showing the locations and design values of air quality monitors in the area, and the counties surrounding any violating air quality monitors. Source data is also labeled in Figure 1 with the following guidelines: if the source emitted 0.5 or more tons, the symbol, name of the facility, and emissions are labeled; if the source emitted 0.1 – 0.5 tons, only the symbol and emissions are labeled; and if the source emitted less than 0.05 tons, only the symbol is shown.¹ Emissions in Eagan and the surrounding areas will be discussed in the section addressing emissions in Dakota. The location of the detailed area in relation to the remainder of the State is shown in the bottom right corner of the figure.

¹ Emissions greater than 0.05 tpy round up to 0.1 tpy, and they are marked with the symbol and the emissions value.



Figure 2: Eagan, Minnesota State Recommended Nonattainment Area (OAQPS and Google Earth)

Figure 2 shows the State recommended nonattainment area boundary for Eagan, Minnesota. The boundary is shown with the red outline, and encompasses the following: Lone Oak Rd. (County Rd. 26) to the north, County Rd. 63 to the east, Wescott Rd. to the south, and Lexington Ave. (County Rd. 43) to the west.

For this area, EPA previously established lead nonattainment boundaries for the 1978 lead NAAQS that included Dakota County (partial) located in Minnesota. The area that was previously designated as nonattainment for the 1978 lead NAAQS (and a current maintenance area) is identical to the State recommended nonattainment area for the 2008 lead NAAQS. However, for each revision to a NAAQS, EPA is required to conduct a separate designation action, which may result in the same or a different nonattainment boundary.

In October 2009, Minnesota recommended that the same portion of Dakota County be designated as nonattainment for the 2008 lead NAAQS based on air quality data from 2006-2008 and 2007-2009. Their recommendation was based on data from Federal Reference Method (FRM) or

Federal Equivalent Method (FEM) monitors located in the State. Paul Eger, Commissioner of the Minnesota Pollution Control Agency (MPCA), submitted the State’s recommendation to EPA in a letter dated October 15, 2009.

Based on EPA’s technical analysis described below, EPA is intending to designate the same partial county as previously designated for the 1978 lead NAAQS as nonattainment for the 2008 lead NAAQS as part of the Eagan nonattainment area, based upon currently available information. This county is listed above in Table 1.

Detailed Assessment

Air Quality Data

This factor considers the Lead design values (in $\mu\text{g}/\text{m}^3$) for air quality monitors in Dakota County in Eagan and the surrounding area based on data for the 2006-2008 and 2007-2009 period. A monitor’s design value indicates whether that monitor attains a specified air quality standard. The 2008 lead NAAQS are met at a monitoring site when the identified design value is valid and less than or equal to $0.15 \mu\text{g}/\text{m}^3$. A design value is only valid if minimum data completeness criteria are met. A lead design value that meets the NAAQS is generally considered valid if it encompasses 36 consecutive valid 3-month site means (specifically for a 3-year calendar period and the 2 previous months). For this purpose, a 3-month site mean is valid if valid data were obtained for at least 75 percent of the scheduled monitoring days in the 3-month period. A lead design value that does not meet the NAAQS is considered valid if at least one 3-month mean that meets the same 75 percent requirement is above the NAAQS. That is, a site does not have to monitor for 3 full calendar years in order to have a valid violating design value; a site could monitor just 3 months and still produce a valid (violating) design value.

County	State Recommended Nonattainment?	Monitor Name	Monitor Air Quality System ID	Monitor Location	Lead Design Value, 2006-2008 ($\mu\text{g}/\text{m}^3$)	Lead Design Value, 2007-2009 ($\mu\text{g}/\text{m}^3$)
Dakota, Minnesota	Yes	Eagan, MN Gopher Resource Corporation	270370465	149th and Yankee Doodle Rd.	0.70	0.70

Monitor in bold has the highest 2006-2008 and 2007-2009 design value in the respective county.

Table 2: Eagan, Minnesota and Surrounding Areas Air Quality Data

Dakota County shows a violation of the 2008 lead NAAQS. Therefore some area in this county and possibly additional areas in surrounding counties must be designated nonattainment. However, the absence of a violating monitor alone is not a sufficient reason to eliminate nearby counties as candidates for nonattainment status. Each area has been evaluated based on the weight of evidence of these factors and other relevant information.

According to EPA's monitor locator,² the monitor located at 149th and Yankee Doodle Rd. (AQS ID 270370465) has an objective for determining the highest concentration of Lead. This monitor is in close proximity to Gopher Resource Corporation (GRC). GRC is a secondary lead smelter, and the emissions from this facility will be discussed in the section addressing emissions in Dakota County. There are 5 other lead monitors in Dakota County, the closest of which is 4.83 miles away from GRC. The AQS ID for this monitor is 270370423, and the design value for this monitor for 2006 – 2008 is 0.005 µg/m³, or 1/30th of the NAAQS.

Emissions and Emissions-Related Data

Evidence of lead emissions sources surrounding a violating monitor are an important factor for determining whether a nearby area is contributing to a monitored violation. For this factor, EPA evaluated county level emission data for lead and population data.

Emissions

Emissions data were derived from the 2005 National Emissions Inventory (NEI), version 2, which is the most up-to-date version of the national inventory available when these data were compiled for the designations process in 2009. See <http://www.epa.gov/ttnchie1/net/2005inventory.html>. EPA recognizes that for certain counties, emissions may have changed since 2005. For example, certain large sources of emissions in or near this area may have installed emission controls or otherwise significantly reduced emissions since 2005. Some States provided updated information on emissions and emission controls in their comments to EPA. Minnesota did not provide updated emissions information, therefore EPA relied on the 2005 NEI emissions data, which are provided in Table 3.

Table 3 shows total emissions of lead given in tons per year (tpy) for violating and potentially contributing counties in and around Eagan and sources emitting (or anticipate to contribute) 0.1 ton per year of lead or more according to the 2005 NEI. The county that is part of the Eagan nonattainment area for the 2008 lead NAAQS is shown in **boldface**.

There are approximately 20,000 airport facilities in the U.S. at which leaded aviation gasoline is consumed. To evaluate the potential impact of emissions at and near these facilities, EPA recommends that States use the draft 2008 NEI. These data are provided in Table 4, and contain the facilities emitting (or anticipate to contribute) 0.1 ton per year or more of lead according to the draft 2008 NEI.

² <http://www.epa.gov/air/data/geosel.html>.

County	Facility in State Recommended Nonattainment Area?	Facility Name	2005 NEI (tpy)	Location	City
Dakota, Minnesota	Yes	Gopher Resource Corporation	3.2	3385 S. Highway 149	Eagan
Dakota, Minnesota	No	Rosemount Aerospace Inc - Burnsville	0.6	14300 Judicial Rd.	Burnsville
Dakota, Minnesota	No	Endres Processing LLC	0.3	13420 Courthouse Blvd.	Rosemount
Dakota, Minnesota	No	Seneca Wastewater Treatment Plant	0.1	3750 Plant Rd.	Eagan
Dakota, Minnesota	No	Flint Hills Resources LP	0.1	12555 Clark Rd.	Rosemount
		Dakota County Total Lead Emissions	4.8*		

Table 3: Eagan, Minnesota and Surround Areas Lead Emissions for Stationary Sources

* Total lead emissions for Dakota County were calculated by adding the 2005 NEI data for facilities not using leaded aviation gas to the 2008 Draft NEI data for facilities using aviation gas. Sources with emissions below 0.1 tpy were included in this final calculation.

City	Facility Name	Type	2008 Draft NEI (tpy)	Distance to NA area (km)
Minneapolis	Airlake	Airport	0.2	22.13
South St Paul	South St Paul Muni-Richard E Fleming Field	Airport	0.1	5.06

Table 4: Eagan, Minnesota and Surrounding Areas Lead Emissions for Leaded Aviation Gas Facilities

According to the 2005 NEI data, there are 5 sources that emit 0.1 ton per year or greater of Lead. The greatest of these is GRC, which EPA observes accounts for 3.2 tons out of 4.8 tons, or 66.7 percent of all lead emissions in Dakota County (refer to Table 3). In addition to continued monitoring at GRC, 2 new monitors commenced operation in January 2010 at, or in close proximity to, stationary sources. These sites include: Federal Cartridge Company - Anoka (Anoka County) and Grede-St Cloud Inc (Stearns County). EPA has taken comment on a proposal to lower the emissions threshold for monitoring requirements from 1.0 ton per year to 0.5 ton per year (74 FR 69050). If the final rulemaking requires monitors at sites that emit 0.5 ton per year or greater of lead, a monitor at Rosemount Aerospace, Inc may be required in the future.³ Lastly, recent stack testing at Dotson Company Inc (Blue Earth County) shows much lower emissions than previously thought, and MPCA intends to apply for a waiver under final promulgation of revisions to monitoring requirements (74 FR 69050).

³ Communication with MPCA staff in April 2010 indicates that the most recent emissions inventory data for Rosemount Aerospace is in actuality, only 0.01 tpy.



Figure 3: GRC Lead Monitor Location (Google Earth)

Figure 3 shows that the lead monitor for GRC is located at the corner of 149th and Yankee Doodle Rd. (approximate location shown by the yellow pin). The distance from the center of the facility, denoted by the red star, to the monitor location is ~.10 miles.

Population Data, Growth Rates, and Patterns

Table 5 shows the 2008 population for each county in the area being evaluated, as well as the population density for each county in that area. These data help assess the extent to which the concentration of human activities in the area and concentration of population-oriented commercial development may indicate emissions-based activity contributing to elevated ambient lead levels. This may include ambient lead contributions from activities that would disturb lead that has been deposited on the ground or on other surfaces. Re-entrainment of historically deposited lead is not reflected in the emissions inventory.

County	State Recommended Nonattainment?	2008 Population	2008 Population Density (pop/sq mi)	Population Change 2000-2008	Population % Change 2000-2008
Dakota, Minnesota	Yes	392,755	672	34,905	10

Table 5: Population Data for Dakota County, Minnesota

[Source of data: U.S. Census Bureau estimates for 2008 (<http://www.census.gov/popest/datasets.html>) and estimation of the area of U.S. counties]

EPA has considered the population growth rate for this area and does not believe that it affects the boundary recommendation.

Emissions Controls

Under this factor, the existing level of control of emission sources is taken into consideration. The emissions data used by EPA in this technical analysis and provided in Table 3 represent emissions levels taking into account any control strategies implemented in Eagan before 2005 on stationary sources. EPA has received additional information on emissions reductions resulting from controls put into place since 2005.

MPCA included a comprehensive description of action items that were taken at GRC in 2009. These action items included emissions and procedure control measures for the blast furnace penthouse, the material transfer room, and the afterburner tower. The cost of the reductions project (as of October 2009) was \$2,250,000, and included the addition of 2 new negative pressure units, hoods, and enclosures. EPA is currently reviewing the permit associated with this project. It is MPCA’s intention to submit the details of this project as a SIP pending final permit issuance. GRC is also in the process of addressing several other smaller priority action items pertaining to kettle combustion vents, roadways, the warehouse and plastics building, the maintenance shop, and other various housekeeping issues. A description of remediation work performed at GRC from 1994 to 2008 was also included in MPCA’s submittal.

Meteorology (weather/transport patterns)

For this factor, EPA considered data from National Weather Service instruments and other meteorological monitoring sites in the area. Historical wind direction frequencies collected between 1960 and 1992 are included in Figure 5 and Table 6. These data may provide evidence of the potential for lead emissions sources located upwind of a violating monitor to contribute to ambient lead levels at the violation location.

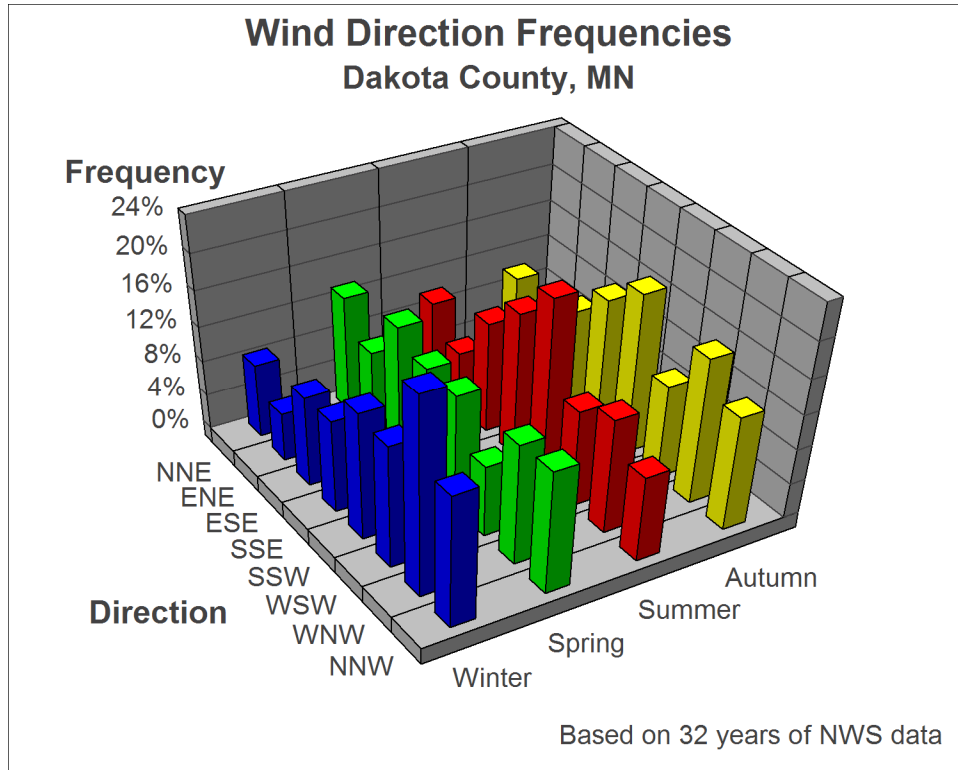


Figure 4: Historical Wind Direction Frequencies for Dakota County, Minnesota

Figure 4 is a 3-dimensional bar chart that shows the wind frequencies in 8 directions for the 4 seasons. These data are taken from 1960-1992 Solar and Meteorological Surface Observation Network information issued jointly by the U.S. Department of Commerce: National Climatic Data Center and the U.S. Department of Energy: National Renewable Energy Laboratory. The chart frequencies reflect the directions from which the winds come.

Dakota County Wind Frequencies	
Frequency as a %	Seasonal Wind Directions
8.43	WINWINDFNNE
5.45	WINWINDFENE
10.33	WINWINDFESE
10.47	WINWINDFSSE
14.40	WINWINDFSSW
13.85	WINWINDFWSW
22.16	WINWINDFNNW
14.91	WINWINDFNNE
13.30	SPRWINDFNNE
9.59	SPRWINDFENE
15.17	SPRWINDFESE
13.28	SPRWINDFSSE
13.07	SPRWINDFSSW
8.07	SPRWINDFWSW
13.64	SPRWINDFNNW
13.88	SPRWINDFNNE
9.89	SUMWINDFNNE
6.64	SUMWINDFENE
12.70	SUMWINDFESE
16.36	SUMWINDFSSE
20.61	SUMWINDFSSW
11.04	SUMWINDFWSW
13.03	SUMWINDFNNW
9.71	SUMWINDFNNE
10.08	AUTWINDFNNE
5.12	AUTWINDFENE
11.19	AUTWINDFESE
15.10	AUTWINDFSSE
18.31	AUTWINDFSSW
10.67	AUTWINDFWSW
16.57	AUTWINDFNNW
12.96	AUTWINDFNNE

Table 6: Historical Wind Frequency Data as Percents for Dakota County, Minnesota

As shown in Figure 5 and Table 6, the period with the highest wind frequency occurs in the winter months, with winds blowing from the west northwest. With the consistently strong representation of winds from the west northwest, and a variation of the west in all seasons, special care must be made when determining the nonattainment boundary to the east of the violating monitor.

Geography/topography (mountain ranges or other air basin boundaries)

The geography/topography analysis evaluates the physical features of the land that might have an effect on the air shed and, therefore, on the distribution of lead over Eagan and the surrounding area.

The Eagan area does not have any geographical or topographical barriers significantly limiting air pollution transport within its air shed. Therefore, this factor did not play a significant role in determining the nonattainment boundary.

Jurisdictional boundaries

Existing jurisdictional boundaries may be helpful in articulating a boundary for purposes of nonattainment designations, and for purposes of carrying out the governmental responsibilities of planning for attainment of the lead NAAQS and implementing control measures. These existing boundaries may include an existing nonattainment or maintenance area boundary, a county or township boundary, a metropolitan area boundary, an air management district, or an urban planning boundary established for coordinating business development or transportation activities.

In EPA's August 21, 2009 guidance memorandum, "Area Designations for the 2008 revised Lead National Ambient Air Quality Standard," EPA reiterated that the presumptive boundary for each nonattainment area should be the county containing the violating monitor. This concept was first introduced in the guidance for the 1978 lead NAAQS designations, and is described in the 1992 General Preamble (57 FR 13549). This same presumptive boundary guidance was addressed most recently in the final rulemaking for the 2008 lead NAAQS (73 FR 66964). EPA observed, however, that States have the flexibility in their recommendations to deviate from the presumptive county boundary to portions of the county containing the violating monitor, stating that any "nonattainment area boundaries that deviate from presumptive county boundaries should be supported by an assessment of several factors..." all of which have been discussed already in this document, except for jurisdictional boundaries.

MPCA has recommended that the same portions of Eagan in Dakota County that were previously designated as nonattainment for the 1978 lead NAAQS (and current maintenance area) be designated as nonattainment for the 2008 lead NAAQS. As EPA performed comprehensive analyses of the nonattainment boundary for the designations under the 1978 lead NAAQS, the current maintenance area is an acceptable reference point. However, the existing maintenance area by itself isn't a true "jurisdictional boundary," as it can be perceived to be artificial. For the Eagan area, there are several jurisdictional areas that can be considered for this factor. Eagan is located in Dakota County, which is part of the Minneapolis-St Paul (Twin Cities) 7-county metropolitan area. Specifically, the portion of Eagan that has been recommended as nonattainment for the 2008 lead NAAQS lies in District 15 of the Metropolitan Council. As a result, air quality planning efforts to address the impending lead nonattainment area in Eagan should not be problematic; it should be noted that the final rulemaking for the 2008 lead NAAQS (73 FR 66964) specifically addressed transportation conformity by stating, "In light of the elimination of lead additives from gasoline, transportation conformity does not apply to the Lead NAAQS." Lastly, MPCA has recommended the nonattainment area be enclosed by well-known

and major roads, which are Lone Oak Rd. (County Rd. 26) to the north, County Rd. 63 to the east, Wescott Rd. to the south, and Lexington Ave. (County Rd. 43) to the west.

Other Relevant Information

EPA received additional relevant information from MPCA for establishing the nonattainment area boundary for Egan. This information will be discussed below.

GRC operates 2 lead monitors that are neither FRM/FEM (GRS-1 and GRS-2). Although the data from these monitors cannot be used to determine if a nonattainment area exists, they can potentially be helpful for establishing the extent of the nonattainment area boundary. GRS-1 is located at the same intersection as the reporting monitor (AQS ID 270370465), and MPCA attempted to correlate the data collected at GRS-1 with the reporting monitor. It was found that the R^2 value between the 2 data sets was approximately 0.61.⁴ This data becomes somewhat useful as GRS-2 is located at the northwester end of the facility property.

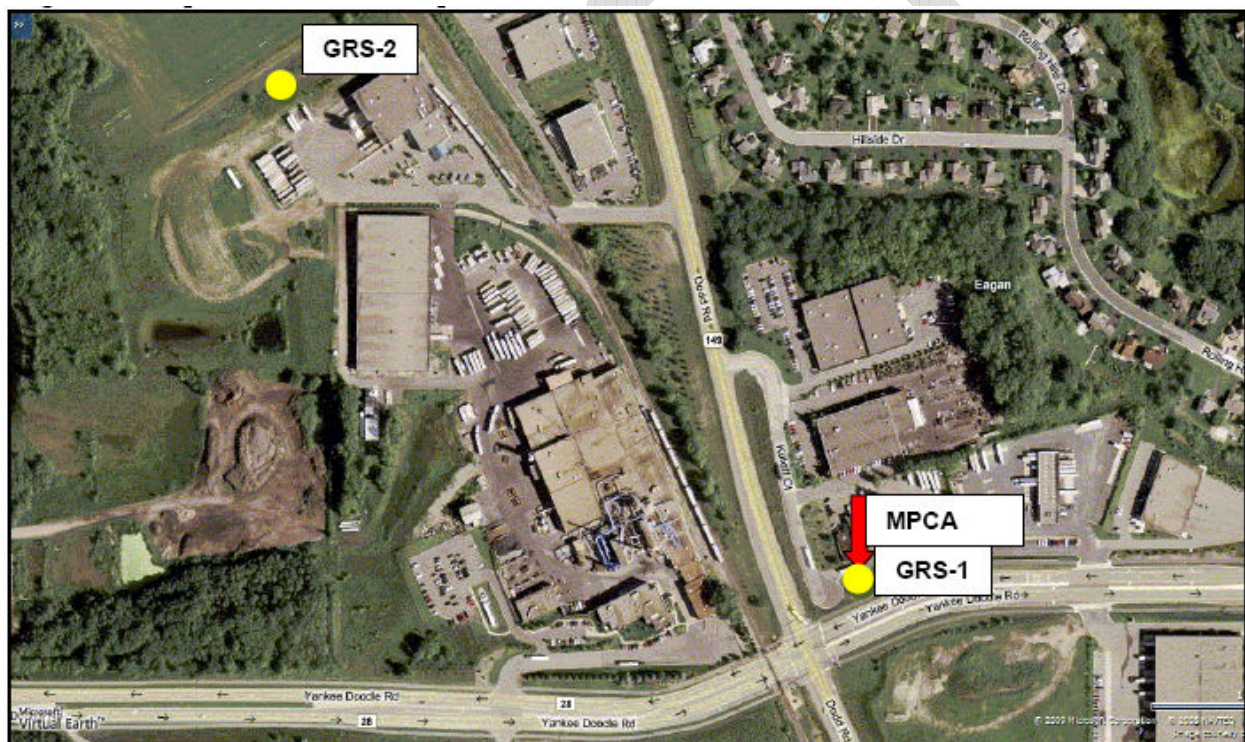


Figure 5: Location of Gopher Resource Corporation's Monitors (GRS-1 and GRS-2)

Figure 5 shows the relationship between GRS-1, the reporting monitor (AQS ID 270370465) and GRS-2. Although the data between GRS-1 and the reporting monitor are not highly correlated, the data collected at GRS-2 does give us some insight into several factors, as the sampling method between GRS-1 and GRS-2 are identical. The 3-month rolling averages collected at GRS-2 are consistently lower than those collected at GRS-1. This supports the wind frequency data that shows that the predominant winds are from some variation of the west. Data

⁴ A R^2 value of 1 would indicate that the 2 monitors are perfectly correlated, and a R^2 value of 0 indicates no correlation whatsoever. The R^2 value is unitless.

comparisons between GRS-1 and the reporting monitor also indicate that in general, GRS-1 under-reports the 3-month rolling averages. Data collected at GRS-2 between 2006 and 2008 show a “violation” of the 2008 lead NAAQS. Assuming that GRS-2 under-reports the averages as well, there is strong evidence that shows that there have been true violations of the 2008 lead NAAQS at the property in close proximity to the GRS-2 monitor location. As a result, the nonattainment area boundary should include at least all of the GRC property.

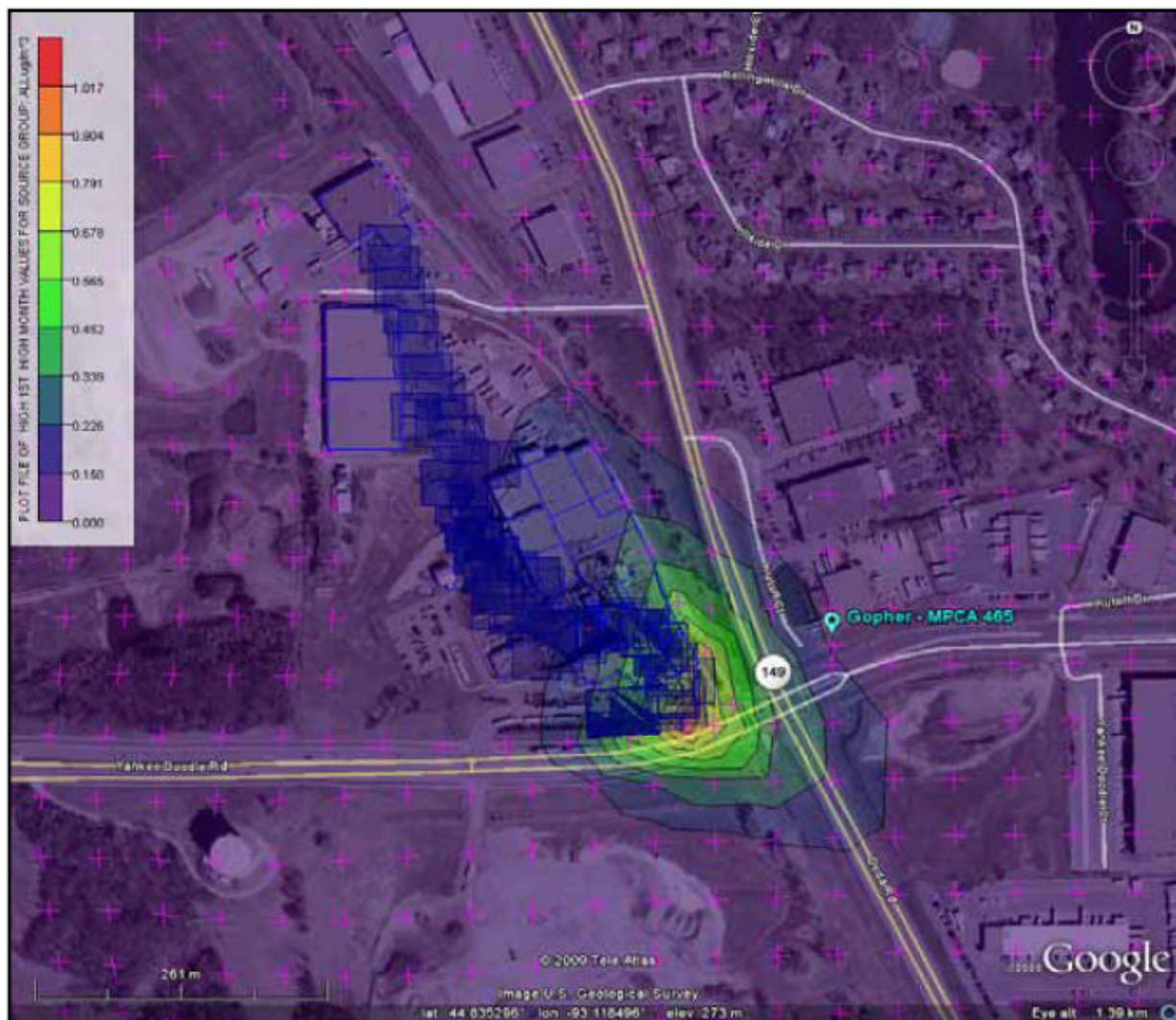


Figure 6: Air Dispersion Modeling for GRC (MPCA)

MPCA provided the modeled maximum monthly average Lead contours for GRC, shown in Figure 6, in their submittal. The emissions that were used to generate the model were based on projected actual emissions after the emissions reduction project as of August 2009. Re-entrainment of dust was factored into the modeling analysis by modeling with volume sources for truck traffic-related re-entrainment of dust. As seen in Figure 6, the modeled impacts indicate that a violation of the 2008 lead NAAQS still occurs in close proximity to the facility. According to this modeling, attainment of the 2008 lead NAAQS commences shortly beyond property line; this distance is approximately 0.10 miles in any direction. No additional

information about the modeling analysis was provided. Draft data provided by MPCA indicates that the 3-month rolling averages for the last portion of 2009 (beginning with the average for August - October and ending with the average for October - December) are all attaining the NAAQS. Subsequent (validated) AQS queries shows attainment of the NAAQS for the same time period. EPA observes that MPCA has added additional distance between the edge of the modeled attainment area and the State recommended nonattainment area boundary to capture all likely negative air quality impacts from the lead emissions at GRC.

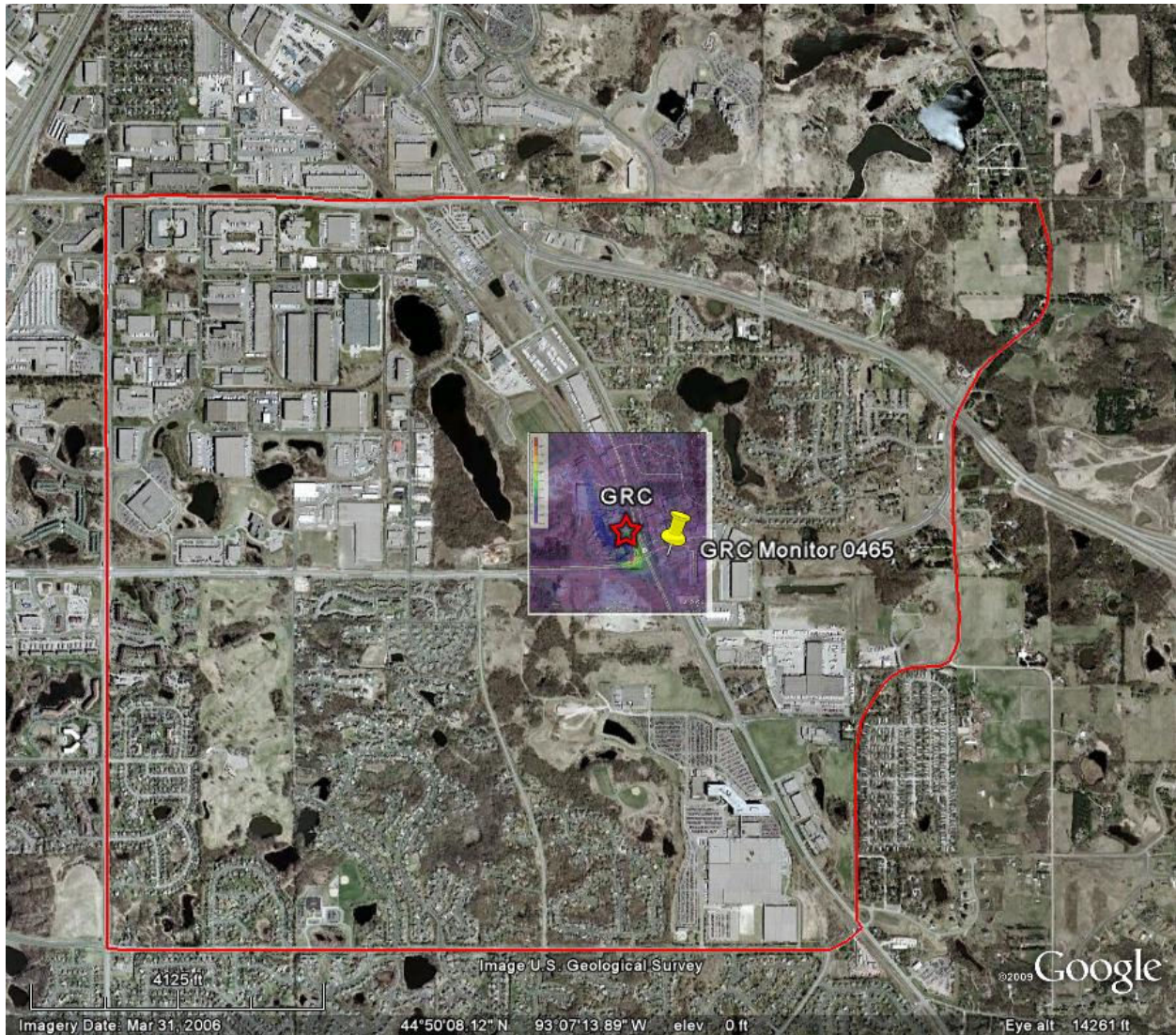


Figure 7: Overlay of Modeling Analysis on State Recommended Nonattainment Area

The modeling analysis from the State has been overlaid on the State recommended nonattainment area in Figure 7. The distance between the facility and the closest boundary of the recommended nonattainment area is approximately 0.80 miles.

Conclusion

After considering the factors described above, EPA has determined that it is appropriate to include the portion of the county listed in Table 1 in the Eagan nonattainment area for the 2008 lead NAAQS. This is the same area previously designated as nonattainment for the 1978 lead NAAQS.

The air quality monitor in Dakota County shows a violation of the 2008 lead NAAQS, based on 2006-2008 and 2007-2009 air quality data. GRC is located in the city of Eagan. This facility accounts for 66.7 percent of all lead emissions in Dakota County, and there are no other major lead emitters in close proximity to the violating monitor. The final and consistent outcomes of the emissions control project have not been realized yet, though there is indication that the rolling 3-month averages have decreased after August 2009. The cumulative process of this factors analysis in conjunction with the other relevant information that MPCA provided ultimately leads to the final nonattainment area. EPA finds it appropriate to designate the portions of Dakota County that are encompassed by: Lone Oak Rd. (County Rd. 26) to the north, County Rd. 63 to the east, Wescott Rd. to the south, and Lexington Ave. (County Rd. 43) to the west as nonattainment for the 2008 lead NAAQS. Based on the consideration of all the relevant and available information, as described above, EPA believes that the boundaries described herein encompass the entire area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the 2008 lead NAAQS.

DRAFT