

PETER SHUMLIN  
Governor



State of Vermont  
OFFICE OF THE GOVERNOR

September 29, 2016

H. Curtis Spalding  
Regional Administrator  
EPA New England, Region 1  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

**Re: Vermont Designations for the 2015 Ozone National Ambient Air Quality Standards**

Dear Mr. Spalding:

In accordance with the requirements of the Clean Air Act Section 107(d)(1) pertaining to area designations, we are pleased to recommend that the State of Vermont be designated as attainment/unclassifiable for both the primary and secondary 2015 ozone National Ambient Air Quality Standards (NAAQS). On October 1, 2015, the EPA promulgated revised primary and secondary NAAQS (80 FR 65292, October 26, 2015) that established a new ozone concentration level of 0.070 parts per million for both standards while retaining their indicators, forms, and averaging times. This submission fulfills our obligation to identify areas in Vermont that have ozone concentrations above the 2015 primary and secondary ozone NAAQS, and designate all areas in the State as nonattainment, attainment, or unclassifiable.

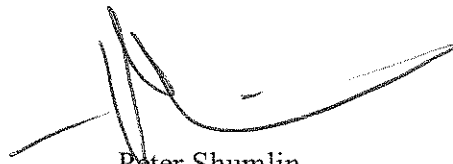
The State of Vermont has used monitored ozone data from 2013-2015 from sites located in Bennington and Chittenden counties, in the towns of Bennington and Underhill, respectively, to calculate design values for reference to the 2015 ozone NAAQS. While these two monitoring locations have effectively represented the northern and southern portions of the state for many years, another ozone monitor in the City of Rutland in Rutland County, in the central part of the state, began operation on April 1, 2016. It is too early to compare ozone data from Rutland to the design values, but preliminary data collected to date have averages within the range measured at Bennington and Underhill. The attached tables summarize the data from Bennington and Underhill and show that both of these monitoring locations currently attain the 8-hour primary and secondary ozone NAAQS. Regional concentration patterns for monitored ozone, including the preliminary data collected at Rutland, support that all other counties in Vermont similarly meet the ozone standards. Therefore, we recommend the entire state of Vermont be designated as attainment/unclassifiable for the 2015 ozone NAAQS.

Despite Vermont's status as attainment/unclassifiable, ozone's regionally episodic nature and the transport of ozone precursors, such as volatile organic compounds and nitrogen oxides, from upwind regions remain a serious threat to this designation. Vermont maintains that our

attainment status depends on the equitable implementation of control measures on sources of ozone-forming precursor emissions in the eastern half of the United States.

Vermont is committed to working with states in the Ozone Transport Region (OTR) on regional control strategies. However, evidence is strong that transport of ozone precursors does not stop at the OTR borders. More broadly applicable measures for the United States are needed to achieve the comprehensive emission reductions of ozone precursors that will eliminate the current widespread non-attainment of ozone standards and the resulting toll on human health and the environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Shumlin', with a long horizontal flourish extending to the right.

Peter Shumlin  
Governor

cc:

David Conroy, Air Programs Branch (EPA Region 1)

Anne Arnold, Air Quality Planning Unit (EPA Region 1)

Enclosures

1. State of Vermont Area Designation Recommendations
2. Vermont Primary and Secondary Ozone Compliance Data
3. Vermont Trends in Ozone Concentration

STATE OF VERMONT  
 AREA DESIGNATIONS UNDER CLEAN AIR ACT SECTION 107(D)  
 PRIMARY AND SECONDARY OZONE NAAQS

POLLUTANT	DESIGNATED AREA (COUNTY)	-----DESIGNATIONS-----	
		NON-ATTAINMENT	ATTAINMENT/ UNCLASSIFIABLE
8-hour ozone	State of Vermont		X
<i>8-hour ozone</i>	<i>Addison</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Bennington</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Caledonia</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Chittenden</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Essex</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Franklin</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Grand Isle</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Lamoille</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Orange</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Orleans</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Rutland</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Washington</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Windham</i>		<i>X</i>
<i>8-hour ozone</i>	<i>Windsor</i>		<i>X</i>

**Vermont Primary and Secondary Ozone Compliance Data**

Year	-----Bennington-----		-----Underhill-----		Notes
	Annual fourth-highest daily maximum	Three-year average of annual fourth- highest daily maximum	Annual fourth-highest daily maximum	Three-year average of annual fourth- highest daily maximum	
	------(ppm)-----				
1987	0.083				1. The level of the 2015 primary and secondary ozone NAAQS is 0.070 parts per million (ppm) over an 8-hour averaging time, in the form of the annual fourth-highest daily maximum, averaged over three years. For the 2015 attainment designation (2013-2015), Vermont is in attainment of the primary and secondary ozone NAAQS. Data were acquired from AQS June 13, 2016.
1988	0.102				
1989	0.082	0.089	0.070		
1990	0.086	0.090	0.072		
1991	0.093	0.087	0.080	0.074	
1992	0.081	0.086	0.086	0.079	
1993	0.082	0.085	0.076	0.080	
1994	0.081	0.081	0.075	0.079	
1995	0.078	0.080	0.074	0.075	
1996	0.079	0.079	0.065	0.071	
1997	0.082	0.079	0.072	0.070	
1998	0.075	0.078	0.073	0.070	
1999	0.083	0.080	0.079	0.074	
2000	0.071	0.076	0.071	0.074	
2001	0.083	0.079	0.076	0.075	
2002	0.086	0.080	0.084	0.077	
2003	0.073	0.080	0.074	0.078	
2004	0.074	0.077	0.071	0.076	
2005	0.073	0.073	0.069	0.071	
2006	0.068	0.071	0.065	0.068	
2007	0.077	0.072	0.077	0.070	
2008	0.069	0.071	0.070	0.070	
2009	0.068	0.071	0.061	0.069	
2010	0.068	0.068	0.063	0.064	
2011	0.059	0.065	0.058	0.060	
2012	0.067	0.064	0.065	0.062	
2013	0.062	0.062	0.062	0.061	
2014	0.061	0.063	0.059	0.062	
2015 <sup>1</sup>	0.063	<b>0.062</b>	0.066	<b>0.062</b>	
2016 <sup>2</sup>		0.063		0.061	

2. Data for the 2016 design value (2014-2016) are preliminary, as of June 2, 2016. Complete air quality data collected in calendar year 2016 will be provided by May 31, 2017.

## Vermont Trends in Ozone Concentrations

Data in the figure below are illustrated for the period 1987 to 2016 at the Bennington (Bennington County) and Underhill (Chittenden County) ozone monitor locations. Note that 2016 averages are subject to change.

