



STATE OF DELAWARE  
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**JUN 13 2011**

EPA, REGION III  
**OFFICE OF REGIONAL ADMINISTRATOR**

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Mr. Shawn M. Garvin (3RA00)  
 Regional Administrator  
 Region III  
 U.S. Environmental Protection Agency  
 1650 Arch Street  
 Philadelphia, PA 19103-2029

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**JUN 14 2011**

Division Director (3AP00)

Dear Administrator Garvin:

On June 2, 2010, the U.S. Environmental Protection Agency (EPA) strengthened the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO<sub>2</sub>) by adding a new 1-hour primary standard of 75 parts per billion (ppb) (3-year average of the 99<sup>th</sup> percentile daily maximum 1-hour concentration). Section 107(d) of the Clean Air Act (CAA) requires the Governor of each State to submit to the EPA a list of all areas (or portions thereof) in the State, designating each as nonattainment, attainment, or unclassifiable. This letter fulfills Delaware's obligations under Section 107(d) of the CAA.

**Area Description and Monitoring Data**

Delaware is composed of three counties, namely New Castle, Kent and Sussex, laying from north to south. The northern portion of New Castle County lies above the Chesapeake and Delaware Canal, a waterway that connects the Chesapeake Bay with the Delaware Bay. This part of New Castle County is more metropolitan and industrialized than the remainder of Delaware. The remainder of Delaware lies south of the Chesapeake and Delaware Canal, and comprises the southern portion of New Castle County, and all of Kent and Sussex Counties.

Delaware currently monitors SO<sub>2</sub> at its Wilmington, Bellefonte, Summit Bridge, and Delaware City monitoring sites, which are all located in New Castle County. The measured ambient SO<sub>2</sub> concentrations (1-hour average, 99<sup>th</sup> percentile) for 2007 through 2009<sup>1</sup> at three of these monitors are shown in the table below. Summit Bridge data is not included due to incomplete data, and the fact that it has historically recorded the lowest SO<sub>2</sub> concentrations.

Site	99th percentile 1-hour average (ppb)			3-year average (ppb)
	2007	2008	2009	2007-2009
Bellefonte	69	60	41	56.7
MLK/Wilmington	58	57	30	48.3
Delaware City	41	51	28	40.0

<sup>1</sup> 2010 data has not undergone quality assurance and is incomplete at this time.

Mr. Shawn M. Garvin (3RA00)

May 11, 2011

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Delaware understands that under this new NAAQS we will be required to install and operate an additional SO<sub>2</sub> monitor in Sussex County/Seaford MSA, to be operational by January 1, 2013. Once this is done our SO<sub>2</sub> monitoring network will be complete.

#### Attainment/Nonattainment Recommendation

The designation approach under this new SO<sub>2</sub> NAAQS uses both air quality monitoring and modeling information. EPA's March 24, 2011 guidance indicates that States should identify areas as attainment, nonattainment or unclassifiable on the basis of available monitoring and modeling information.

Based on available monitoring and modeling information, Delaware recommends that each of its three Delaware counties be designated as "unclassifiable" for the 75 ppb 1-hour SO<sub>2</sub> NAAQs.

- Delaware has no available monitoring or modeling information that supports a nonattainment designation.
- Delaware's existing SO<sub>2</sub> monitoring network is not sufficient to support an attainment designation.
- Delaware has not completed all of the air dispersion modeling necessary to support either an attainment or nonattainment designation.

This recommendation is consistent with the EPA expectation outlined in the Stephen D. Page, Director, EPA Office of Air Quality Planning and Standards, March 24, 2011 memorandum, "*Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards.*" This memorandum states, "*Given the currently limited network of SO<sub>2</sub> monitors, and our expectation that states will not yet have completed appropriate modeling of all significant SO<sub>2</sub> sources, we anticipate that most areas of the country will be designated 'unclassifiable.'*"

Thank you for your consideration of this recommendation. If you have any questions concerning this submittal or would like to discuss it further, please contact Mr. Ali Mirzakhilili, P.E., the Director of our Division of Air Quality, at (302)739-9402.

Sincerely,



Jack A. Markell  
Governor

pc: Collin O'Mara  
Dave Small  
Ali Mirzakhilili  
Diana Esher