



Assigned 6/8

STATE OF NEBRASKA

Dave Heineman
Governor

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June 1, 2011

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Karl Brooks
Regional Administrator
EPA Region 7
901 N 5th Street
Kansas City, KS 66101

Dear Mr. Brooks:

In accordance with Section 107(d)(1) of the Clean Air Act, I am submitting the designation recommendation for the 1-hour Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) which became effective on August 23, 2010. I recommend all counties in the State of Nebraska be designated as *unclassifiable*, consistent with the United States Environmental Protection Agency's (US EPA's) March 24, 2011, designation guidance.

The attachment compares air quality data for all SO₂ monitors in the state to the 1-hour SO₂ NAAQS of 75 parts per billion (ppb). The documentation demonstrates that the 99th percentile of daily maximum monitored concentrations for SO₂ was in compliance with the 1-hour NAAQS of 75 parts per billion (ppb) during the most recent consecutive three-year period (2008-2010). However, per US EPA guidance, modeling analysis clearly demonstrating attainment is also required to designate an area attainment. An area without monitored violations, without a completed modeling analysis should be designated as unclassifiable. Nebraska has not yet completed source dispersion modeling, therefore, in the absence of a violating monitor; I am recommending an *unclassifiable* designation.

If there are questions regarding my recommendation, please feel free to contact Mike Linder, Director of the Nebraska Department of Environmental Quality.

Sincerely,

Dave Heineman
Governor

Attachment

Sulfur Dioxide Data**Comparison of 1-Hour Sulfur Dioxide Levels to the NAAQS ⁽¹⁾**

Site	2008	2009	2010	3 Year Average	% NAAQS
1616 Whitmore St., Omaha	70.0	73.0	58.0	67.0	89.3%
11300 North Post Rd, Omaha	3.0	5.0	4.6	4.2	5.6%

Notes and Explanations:

(1) All levels are in parts per billion (ppb). The 1-hour NAAQS is 75 ppb. The 1-hour primary standard is met at an ambient air quality monitoring site when the three-year average of the annual (99th percentile) of the daily maximum 1-hour average concentrations is less than or equal to 75 ppb. This 1 hour SO² NAAQS was promulgated on June 22, 2010.