



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

Fax: 804-698-4019 - TDD (804) 698-4021

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

June 2, 2011

Mr. Shawn M. Garvin
Regional Administrator
EPA Region III
1650 Arch Street
Mail Code: (3RA00)
Philadelphia, PA 19103-2029

Dear Mr. Garvin:

Pursuant to Section 107 (d) (1) (A) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I hereby submit the initial recommendations and comments on the designations of areas in Virginia under the 2010 1-Hour National Ambient Air Quality Standard (NAAQS) for Sulfur Dioxide (SO₂). Furthermore, this letter is in direct response to the guidance provided in the March 24, 2011, memorandum from Stephen D. Page that outlines the data and analyses to be considered in making these initial area designation recommendations.

The Department of Environmental Quality (DEQ) operates an ambient SO₂ monitoring network in Virginia. The latest ambient concentrations observed by this monitoring network are well below the level of the new standard (see Enclosure I) and have steadily decreased since 2000. At the same time, emissions of SO₂ have also significantly decreased as a result of both state and federal control programs. We believe that these observed levels and trends are generally representative of the Commonwealth as a whole with regard to the pollution exposure and air quality improvement experienced by the general public. However, it is recognized that these levels may not be representative of specific major source impacts and other high emissions locations that are targeted by the designation and evaluation procedures that have been promulgated along with the new standard. It is also recognized that a large portion of Virginia is and will not be directly monitored for SO₂ levels due to resource considerations and constraints.

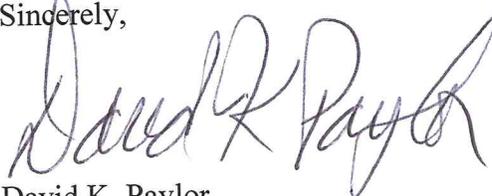
Therefore, I respectfully request that all of Virginia be designated as "unclassifiable" under the new SO₂ standard until additional data and analyses become available for future designation determination purposes (see Enclosure II). I do so with several reservations which are described below.

At this time, I must point out several serious concerns that the DEQ has regarding the implementation of this new standard.

- The implementation approach that EPA has chosen is troubling for several reasons. First and foremost, this approach represents a drastic departure from the normal process used in the past to designate areas and develop air quality plans for areas under previous NAAQS.
- This “hybrid” approach relies too heavily on highly conservative and resource intensive air quality modeling techniques over the more traditional monitoring approach. The subsequent requirement to develop and submit Section 110(a)(1) State Implementation Plans (SIPs) for areas that are designated “unclassifiable” further increases the burden and workload involved.
- The apparent choice to use allowable emissions to establish a source threshold to perform the required evaluation adds to our concern. This could require the combination of modeling and permitting for over 100 sources in Virginia alone. This represents an enormous workload to contend with during a period of limited and stretched state resources. Furthermore, this approach does not account for or acknowledge the difference between very large and very small sources in terms of actual air quality impacts.
- Given the complex and time consuming process involved, the standard implementation schedule and milestones are unrealistic and probably unachievable. This is particularly the case for the June 2013 deadline for submitting the Section 110(a) (1) maintenance SIPs.
- This standard will be a difficult challenge for existing and even new sources that must demonstrate compliance with the standard. In light of the concerns raised and shared by many states, EPA must issue reasonable and workable guidance in a timely manner to facilitate the implementation process. This is most important to continue to promote energy and economic development in Virginia.

Thank you again for this opportunity to provide input on this important issue for Virginia. Please contact me if you have any questions concerning these recommendations.

Sincerely,



David K. Paylor

Enclosures

cc: Diana Esher, EPA Region III Air Protection Division Director (3AP00) w/enclosures
The Honorable Douglas W. Domenech, Secretary of Natural Resources w/enclosures
Michael Dowd, DEQ Air Quality Division Director

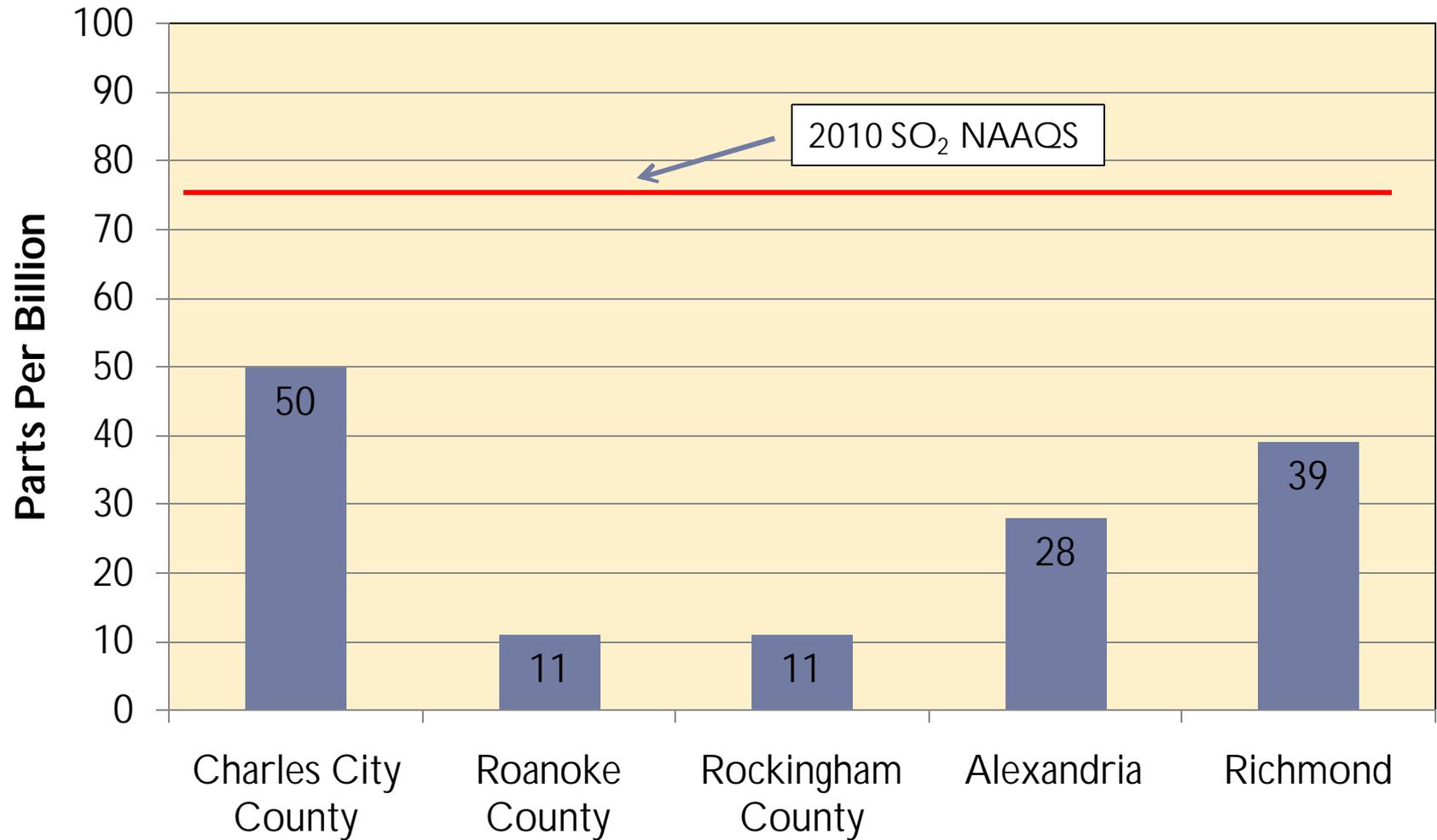
Enclosure I

Virginia SO₂ Air Quality and Emissions Data

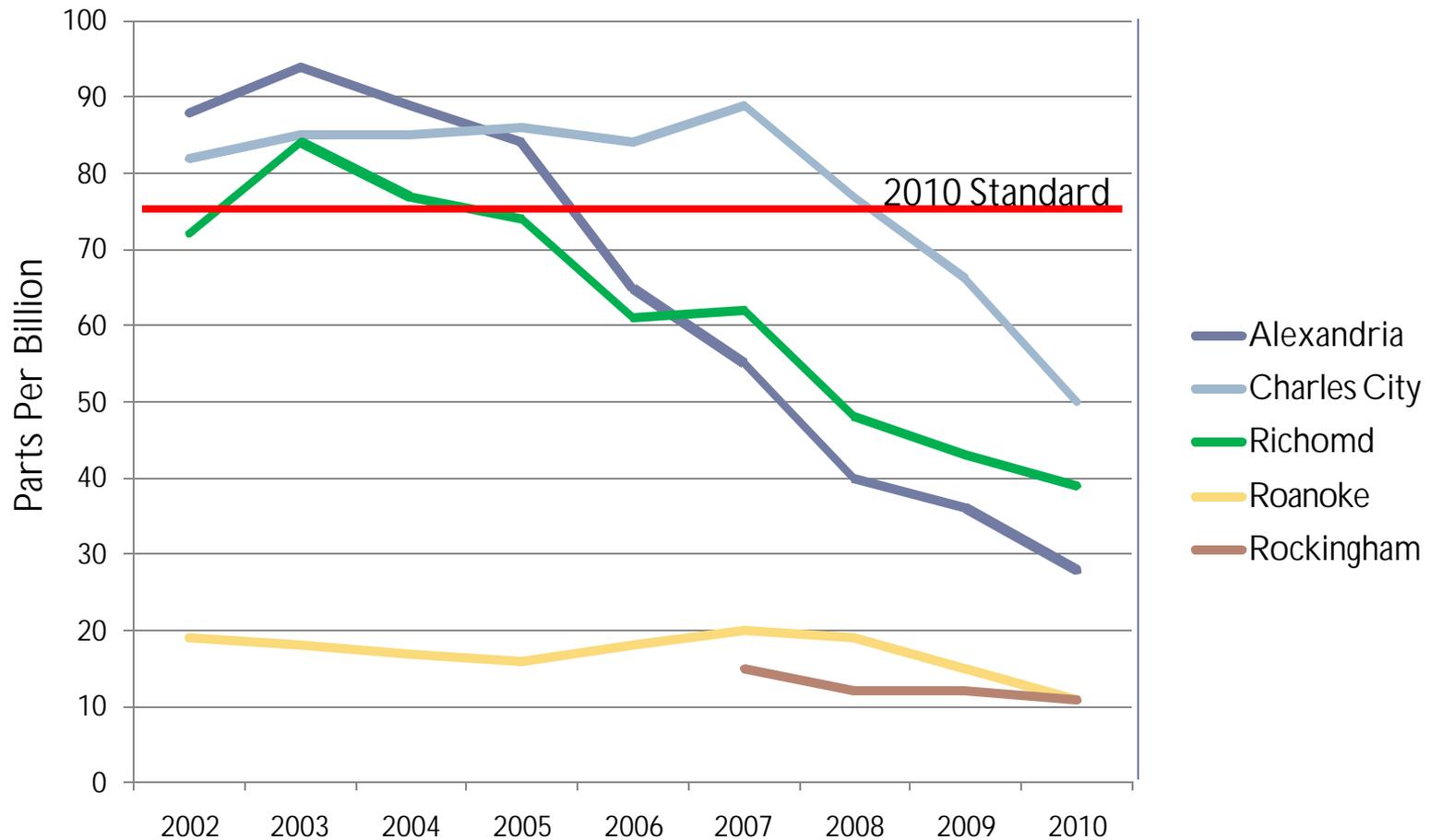
1. SO₂ Monitoring Network
2. SO₂ Monitoring Data
3. SO₂ Monitoring Data Trends
4. 2008 Statewide Emissions
5. 2008 Statewide Emissions Profile
6. SO₂ Emissions Trends
7. Point Source Emission Trends



SO₂ MONITORING DATA (2008-2010)

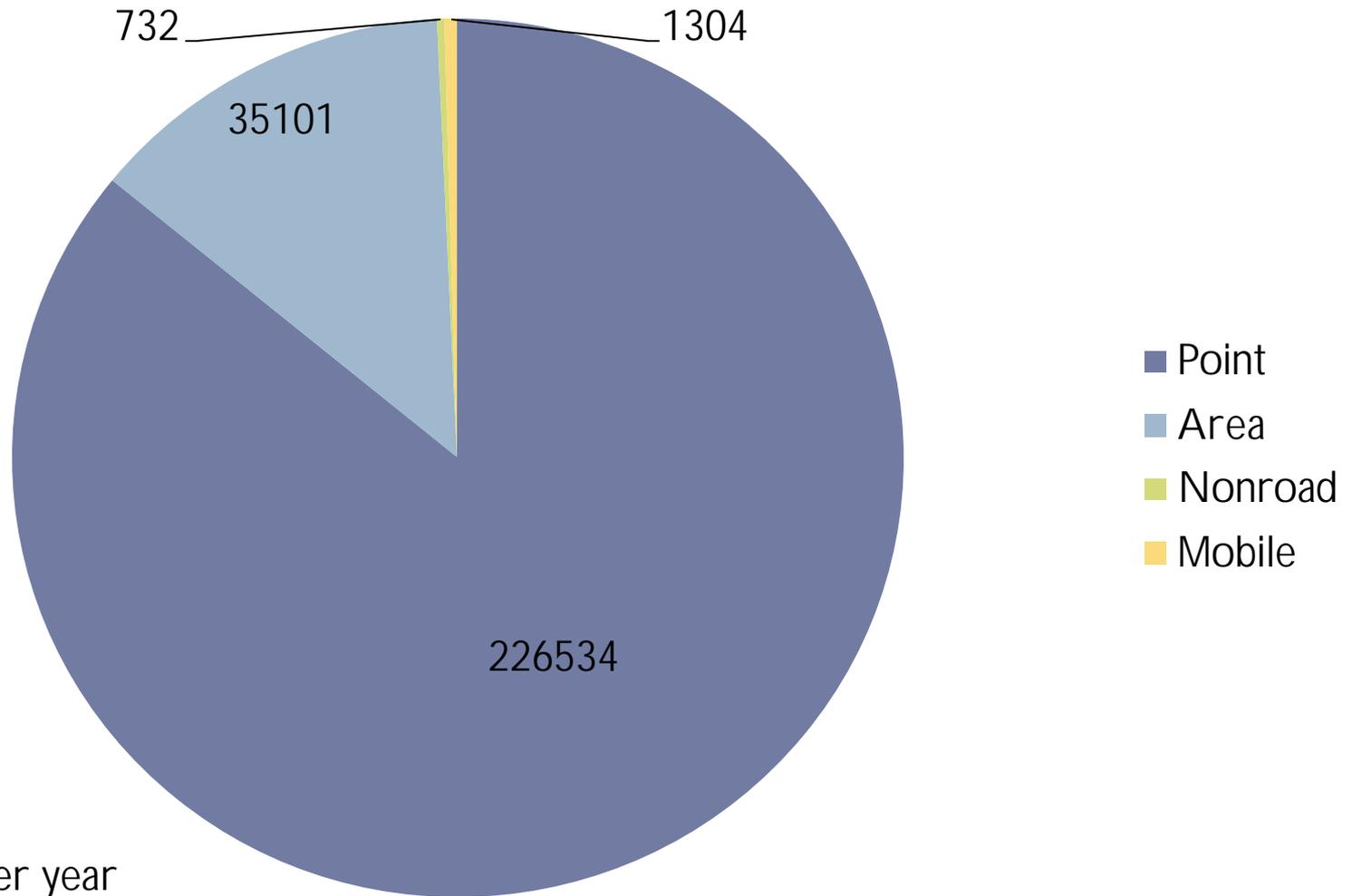


SO₂ MONITORING DATA TRENDS*



* Monitor Design Values from 2002 to 2010

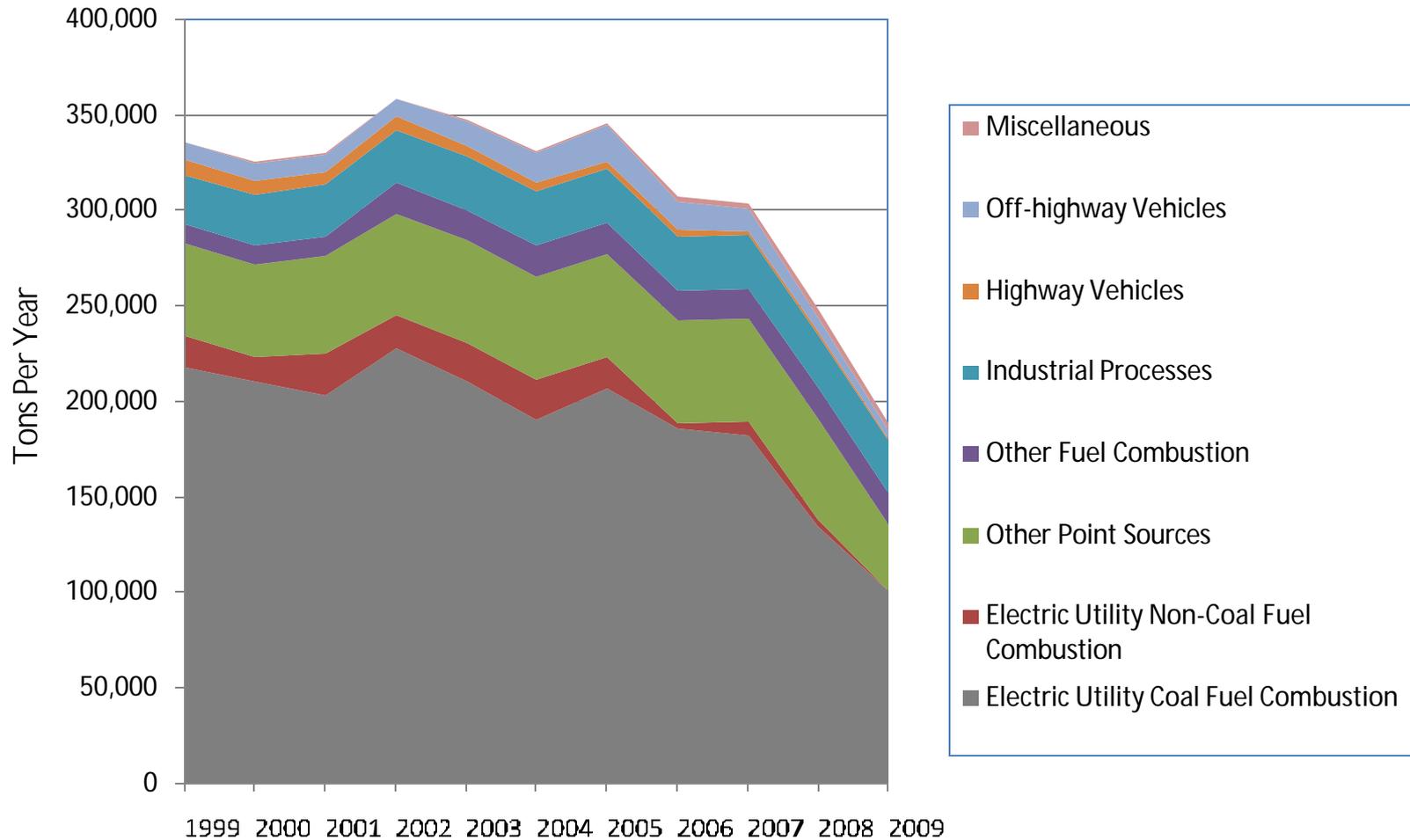
Virginia Statewide 2008 SO₂ Emissions*



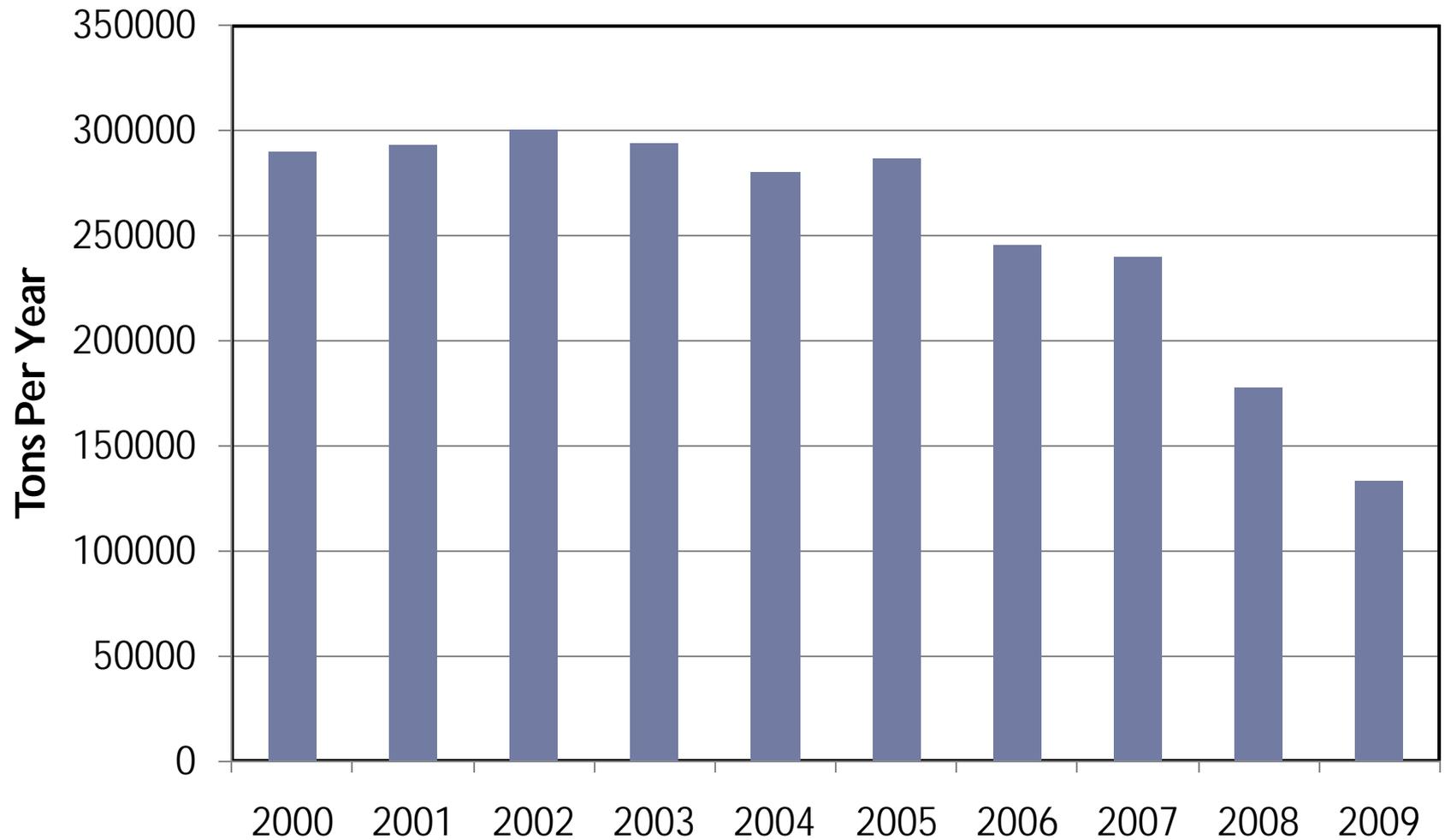
* In tons per year



VA SO₂ EMISSIONS TRENDS



VA Point Source SO₂ Emissions Trend*



Enclosure II

§ 81.347 Virginia

* * * * *

Virginia-Sulfur Dioxide

Designated Area	Designation	Classification
	Type	Type
Accomack County	Unclassifiable	
Albemarle County	Unclassifiable	
Alexandria	Unclassifiable	
Alleghany County	Unclassifiable	
Amelia County	Unclassifiable	
Amherst County	Unclassifiable	
Appomattox County	Unclassifiable	
Arlington County	Unclassifiable	
Augusta County	Unclassifiable	
Bath County	Unclassifiable	
Bedford	Unclassifiable	
Bedford County	Unclassifiable	
Bland County	Unclassifiable	
Botetourt County	Unclassifiable	
Bristol	Unclassifiable	
Brunswick County	Unclassifiable	
Buchanan County	Unclassifiable	
Buckingham County	Unclassifiable	
Buena Vista	Unclassifiable	
Campbell County	Unclassifiable	
Caroline County	Unclassifiable	
Carroll County	Unclassifiable	
Charles City County	Unclassifiable	
Charlotte County	Unclassifiable	
Charlottesville	Unclassifiable	
Chesapeake	Unclassifiable	
Chesterfield County	Unclassifiable	
Clarke County	Unclassifiable	
Clifton Forge	Unclassifiable	
Colonial Heights	Unclassifiable	
Covington	Unclassifiable	
Craig County	Unclassifiable	
Culpeper County	Unclassifiable	
Cumberland County	Unclassifiable	
Danville	Unclassifiable	
Dickenson County	Unclassifiable	

Dinwiddie County	Unclassifiable	
Emporia	Unclassifiable	
Essex County	Unclassifiable	
Fairfax	Unclassifiable	
Fairfax County	Unclassifiable	
Falls Church	Unclassifiable	
Fauquier County	Unclassifiable	
Floyd County	Unclassifiable	
Fluvanna County	Unclassifiable	
Franklin	Unclassifiable	
Franklin County	Unclassifiable	
Frederick County	Unclassifiable	
Fredericksburg	Unclassifiable	
Galax	Unclassifiable	
Giles County	Unclassifiable	
Gloucester County	Unclassifiable	
Goochland County	Unclassifiable	
Grayson County	Unclassifiable	
Greene County	Unclassifiable	
Greensville County	Unclassifiable	
Halifax County	Unclassifiable	
Hampton	Unclassifiable	
Hanover County	Unclassifiable	
Harrisonburg	Unclassifiable	
Henrico County	Unclassifiable	
Henry County	Unclassifiable	
Highland County	Unclassifiable	
Hopewell	Unclassifiable	
Isle Of Wight County	Unclassifiable	
James City County	Unclassifiable	
King And Queen County	Unclassifiable	
King George County	Unclassifiable	
King William County	Unclassifiable	
Lancaster County	Unclassifiable	
Lee County	Unclassifiable	
Lexington	Unclassifiable	
Louisa County	Unclassifiable	
Loudoun County	Unclassifiable	
Lunenburg County	Unclassifiable	
Lynchburg	Unclassifiable	
Madison County	Unclassifiable	
Manassas	Unclassifiable	
Manassas Park	Unclassifiable	
Martinsville	Unclassifiable	
Mathews County	Unclassifiable	
Mecklenburg County	Unclassifiable	
Middlesex County	Unclassifiable	

Montgomery County	Unclassifiable	
Nelson County	Unclassifiable	
New Kent County	Unclassifiable	
Newport News	Unclassifiable	
Norfolk	Unclassifiable	
Northampton County	Unclassifiable	
Northumberland County	Unclassifiable	
Norton	Unclassifiable	
Nottoway County	Unclassifiable	
Orange County	Unclassifiable	
Page County	Unclassifiable	
Patrick County	Unclassifiable	
Petersburg	Unclassifiable	
Pittsylvania County	Unclassifiable	
Poquoson	Unclassifiable	
Portsmouth	Unclassifiable	
Powhatan County	Unclassifiable	
Prince Edward County	Unclassifiable	
Prince George County	Unclassifiable	
Prince William County	Unclassifiable	
Pulaski County	Unclassifiable	
Radford	Unclassifiable	
Rappahannock County	Unclassifiable	
Richmond	Unclassifiable	
Richmond County	Unclassifiable	
Roanoke	Unclassifiable	
Roanoke County	Unclassifiable	
Rockbridge County	Unclassifiable	
Rockingham County	Unclassifiable	
Russell County	Unclassifiable	
Salem	Unclassifiable	
Scott County	Unclassifiable	
Shenandoah County	Unclassifiable	
Smyth County	Unclassifiable	
South Boston	Unclassifiable	
Southampton County	Unclassifiable	
Spotsylvania County	Unclassifiable	
Stafford County	Unclassifiable	
Staunton	Unclassifiable	
Suffolk	Unclassifiable	
Surry County	Unclassifiable	
Sussex County	Unclassifiable	
Tazewell County	Unclassifiable	
Virginia Beach	Unclassifiable	
Warren County	Unclassifiable	
Washington County	Unclassifiable	
Waynesboro	Unclassifiable	

Westmoreland County	Unclassifiable	
Williamsburg	Unclassifiable	
Winchester	Unclassifiable	
Wise County	Unclassifiable	
Wythe County	Unclassifiable	
York County	Unclassifiable	