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October 14, 2009

Ira W. Leighton
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Mr. Leighton:

On October 15, 2008, the U.S. Environmental Protection Agency (EPA) revised the National Ambient Air Quality Standard (NAAQS) for lead, lowering it from 1.5 micrograms per cubic meter ($\mu g/m^3$) to 0.15 $\mu g/m^3$. I am responding to EPA's request for my recommendations concerning the attainment status of Massachusetts under the revised lead NAAQS.

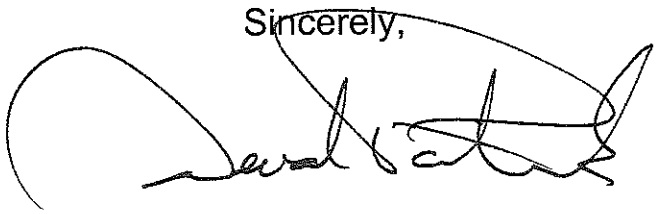
Massachusetts currently has one air quality monitor with ambient lead level measurements, which is located in Kenmore Square, Boston, Suffolk County. The certified air monitoring data from this monitor (Attachment 1) demonstrates that the monitored lead level for each rolling three-month period in 2006-2008 does not exceed 0.15 $\mu g/m^3$. Therefore, I recommend that EPA designate Massachusetts as attainment for Suffolk County for the 2008 lead NAAQS.

Since EPA has not required widespread lead monitoring, the remainder of Massachusetts does not currently have air quality monitors measuring ambient lead levels. Therefore, I recommend that EPA designate the remainder of Massachusetts as unclassifiable for the 2008 lead NAAQS. Additional lead monitoring will be implemented in Massachusetts in accordance with EPA's new lead monitoring requirements. Data from these monitors will be used to support future attainment/nonattainment recommendations.

If you require further information in support of these recommendations, please contact Commissioner Laurie Burt at the Department of Environmental Protection (617-292-5856). An electronic copy of this material is being provided to your staff.

I look forward to continuing to work with you to improve environmental quality in Massachusetts.

Sincerely,



Enclosure

ATTACHMENT 1

MASSACHUSETTS 2006-2008 MONITORED LEAD DATA

To develop the recommendation on Massachusetts' attainment status for Suffolk County for the 2008 National Ambient Air Quality Standard (NAAQS) for lead, the Massachusetts Department of Environmental Protection analyzed certified data from its ambient air monitor located in Kenmore Square, Boston, for the three-year period 2006-2008. This monitor evaluates the amount of lead in total suspended particulate (TSP) and is located within an urban area impacted by re-entrained dust from roadways.

Data Requirements for the 2008 Lead Standards

The 2008 lead NAAQS is a rolling three-month period with a maximum form based on a three-year period. The level of the 2008 lead standard is 0.15 micrograms per cubic meter ($\mu g/m^3$). A monitor is in violation of the standard if it exceeds 0.15 $\mu g/m^3$.

Summary of Monitored Data

The table below summarizes the certified lead data collected by the Massachusetts monitoring network for the three-year period 2006-2008. One monitor located at Kenmore Square in Boston (EPA AQS code 25-025-002) recorded ambient lead data for the required three-year period used to determine compliance with the standard. This monitor was in attainment of the lead standard for all rolling three-month periods with a maximum value of 0.0247 micrograms per cubic meter ($\mu g/m^3$).

Year	Months	Average
2006	1-3	0.0050
	2-4	0.0057
	3-5	0.0057
	4-6	0.0077
	5-7	0.0070
	6-8	0.0070
	7-9	0.0050
	8-10	0.0050
	9-11	0.0063
	10-12	0.0067
	11-13	0.0050
	12-14	0.0020
2007	13-15	0.0067
	14-16	0.0107
	15-17	0.0147
	16-18	0.0127
	17-19	0.0180

Year	Months	Average
2007	18-20	0.0197
	19-21	0.0193
	20-22	0.0147
	21-23	0.0143
	22-24	0.0120
	23-25	0.0127
	24-26	0.0110
2008	25-27	0.0157
	26-28	0.0190
	27-29	0.0230
	28-30	0.0247
	29-31	0.0213
	30-32	0.0180
	31-33	0.0133
	32-34	0.0150
	33-35	0.0147
	34-36	0.0140