



VINCENT C. GRAY  
MAYOR

January 20, 2011

Shawn M. Garvin  
Regional Administrator  
U.S. Environmental Protection Agency, Region III  
Mail Code 3RA00  
1650 Arch Street  
Philadelphia, PA 19103

Subject: Recommendation to EPA to Designate the District as an "Unclassifiable" Area for the 2010 NO<sub>2</sub> NAAQS

Dear Mr. Garvin:

On behalf of the District of Columbia (District), I thank you for the opportunity to make a designation recommendation on the air quality status in the District for the 2010 nitrogen dioxide (NO<sub>2</sub>) National Ambient Air Quality Standards (NAAQS). The existing monitoring in the District does not meet the requirements of the revised NO<sub>2</sub> NAAQS final rulemaking (75 FR 6474; February 9, 2010). Hence, in accordance with Section 107(d)(1) of the Clean Air Act, I am recommending that the District be designated as an "unclassifiable" area under the 2010 NO<sub>2</sub> NAAQS.

I understand that the U.S. Environmental Protection Agency (EPA) is retaining the current annual average NO<sub>2</sub> standard of 53 parts per billion (ppb), while setting a new 1-hour NO<sub>2</sub> standard at a level of 100 ppb to protect against short-term exposures. In addition, EPA is establishing new ambient air monitoring and reporting requirements for NO<sub>2</sub> to determine compliance with new standards.

The District currently operates three NO<sub>2</sub> ambient air monitors, and these monitors measure population exposure at a community scale. However, since the District is part of a larger metropolitan area with population over 2.5 million, at least two new NO<sub>2</sub> monitors will need to be established near major roadways in the metropolitan area. EPA retains discretion to require additional monitors to protect susceptible and vulnerable populations.

The existing NO<sub>2</sub> monitors in the District do not meet the near-roadway monitoring requirements of the new 1-hour standard and there are insufficient data to make a determination about the

District's compliance with the revised NAAQS. Hence, I am recommending an "unclassifiable" designation at this time. The District is coordinating with environmental agencies in the State of Maryland and the Commonwealth of Virginia and expects to have the new near-roadway NO<sub>2</sub> monitors in operation by the regulatory deadline of January 1, 2013. We anticipate sufficient federal resources to establish and maintain NO<sub>2</sub> monitoring in the District.

Should you require additional information on this matter, please contact Mr. Christophe Tulou, Director of the District Department of the Environment (DDOE), at (202) 535-2615 or Ms. Cecily Beall, Associate Director of the Air Quality Division of DDOE, at (202) 535-2626.

Sincerely,

  
Vincent C. Gray  
Mayor  
Government of the District of Columbia

cc: Diana Esher, Director, Air Protection Division, EPA Region III  
Christophe A. G. Tulou, Director, District Department of the Environment  
Cecily Beall, Associate Director, Air Quality Division, DDOE