



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

JUN 14 2011

The Honorable Benigno R. Fitial
Governor
Commonwealth of the Northern Mariana Islands
Juan A. Sablan Memorial Building
Capitol Hill
Saipan, Marianas Protectorate 96950

Dear Governor Fitial:

On September 9, 2009, the U.S. Environmental Protection Agency (EPA) sent a letter informing you of your opportunity to provide recommendations on air quality designations for the revised National Ambient Air Quality Standards for lead throughout the Commonwealth of the Northern Mariana Islands. This letter is to notify you of the EPA's preliminary decision to designate all of CNMI as unclassifiable/attainment and to inform you of our approach for completing the designations for the revised lead standards.

Reducing levels of lead pollution is an important part of the EPA's commitment to a clean, healthy environment. Lead exposure can cause a range of adverse health effects, most notably in children. Exposures to low levels of lead early in life have been linked to effects on IQ, learning, memory, and behavior.

On October 15, 2008, the EPA substantially strengthened the health-based or "primary" National Ambient Air Quality Standard for lead by lowering it from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) – a level set in 1978 – to a level of $0.15 \mu\text{g}/\text{m}^3$. This stronger standard provides increased protection against adverse health effects associated with exposure to lead in at-risk groups, including children. To provide increased protection against lead-related environmental and other welfare effects, the EPA revised the secondary National Ambient Air Quality Standard to be identical in all respects to the revised primary standard. The EPA also determined that the pre-existing ambient lead monitoring network was inadequate for determining whether many areas are meeting the revised lead standards and established new criteria for siting ambient lead monitors and new data collection requirements. Monitors meeting the new network siting requirements were to begin operation January 1, 2010.

Within two years of promulgating new or revised National Ambient Air Quality Standards, the Clean Air Act requires the EPA to complete the initial process of identifying or designating areas that meet or do not meet an air quality standard. If the Administrator has insufficient information to make these designations, the EPA has the authority to extend the designation process by up to one year. In light of the new monitoring network, the EPA is completing the lead designations in two rounds. In the first

round, published on November 16, 2010, the EPA designated as “nonattainment” 16 areas as violating the 2008 Lead National Ambient Air Quality Standards based on data from the pre-2010 monitoring network. For all other areas, the EPA extended the deadline for designations by up to one year so that data from the newly deployed monitors can be considered in making appropriate designation decisions. States were given an opportunity to update their recommendation letters for those remaining areas for our consideration in the second round of designations by December 15, 2010. The EPA intends to complete the second round of lead designations by no later than October 14, 2011.

Consistent with the Clean Air Act, and after carefully considering all the associated technical information for the 2008 Lead National Ambient Air Quality Standards the EPA is proposing to designate CNMI as unclassifiable/attainment. The EPA uses this designation for initial designations to identify areas that have data indicating attainment, or where there is no evidence of a violation.

The EPA’s preliminary designation decisions and supporting documentation will be made available to the general public for review. We will be accepting comments through August 15, 2011. We will review any information we receive from CNMI and the general public by this date, and we plan to promulgate the second round of final designations by October 14, 2011.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2008 Lead National Ambient Air Quality Standards. Should you have any questions, please do not hesitate to call me, or have your staff contact Air Division Director Deborah Jordan at 415-947-8715.

Sincerely,



Jared Blumenfeld

cc: Frank Rabauliman
Director, CNMI Division of Environmental Quality