



State of Rhode Island and Providence Plantations

State House
Providence, Rhode Island 02903-1196
401-222-2080

Gina M. Raimondo
Governor

September 27, 2016

Curt Spalding
Regional Administrator
US Environmental Protection Agency Region I
5 Post Office Square, Suite 100
Mail Code: ORA01-4
Boston, MA 02109-3912

Dear Mr. Spalding:

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990, Rhode Island is hereby submitting its recommendation for the State's attainment status designation for the 2015 revised National Ambient Air Quality Standard (NAAQS) for ozone. Section 107(d)(1) defines nonattainment areas as areas that do not meet, or that contribute to ambient air quality in a nearby area that does not meet, the NAAQS for a pollutant.

A site is in violation of the eight-hour NAAQS if the monitored design value for that site is greater than 70 parts per billion (ppb). The design value is calculated by averaging the fourth highest maximum daily eight-hour ozone concentration measured at a site each year in three consecutive years. The eight-hour ozone design values for the three Rhode Island ozone monitoring sites for the most recent three-year period with certified data, 2013 – 2015, are included in the table below.

Site	County	Design Value (ppb)
W. Greenwich	Kent	70
Narragansett	Washington	73
E. Providence	Providence	70

The design value for the Narragansett monitoring site exceeds 70 ppb. On the basis of the most recent certified data (2013 – 2015), our designation recommendation should be nonattainment. However, we ask that the EPA consider 2014 – 2016 data when making the designation decision. The 2014 – 2016

data set is preliminary and not yet certified, however it will be certified by the time EPA is required to make its designation for the 2015 ozone NAAQS. The eight-hour ozone design values for the three Rhode Island ozone monitoring sites for the 2014 – 2016 three-year period were calculated as follows:

Site	County	Design Value (ppb)
W. Greenwich	Kent	70
Narragansett	Washington	70
E. Providence	Providence	68

No monitoring site in Rhode Island would exceed the 70 ppb standard based on this data set. Therefore, we ask that you consider a designation recommendation of attainment per the 2014 – 2016 data set.

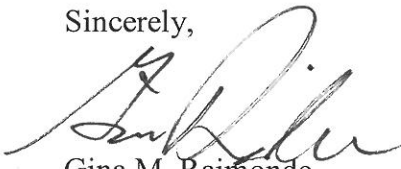
The EPA’s guidance for designating areas for the 2015 revised ozone NAAQS¹ states that the EPA intends to consider information relevant to designations associated with counties in the Combined Statistical Area (CSA) or the Core Based Statistical Area (CBSA) associated with the violating monitor for determining the boundaries of a nonattainment area. The Rhode Island monitors are located in the Providence–Warwick, RI-MA CBSA, which includes all five of the Rhode Island counties as well as Bristol County in Massachusetts.

For ease of administration, I am recommending that, as with previous ozone NAAQS, the Rhode Island 2015 ozone nonattainment (or attainment) area be defined by the boundaries of the State of Rhode Island, rather than the boundaries of the CBSA.

Rhode Island is keenly aware that the State’s ozone levels are strongly influenced by upwind states’ emissions. Therefore, for Rhode Island’s ozone air quality to continue to improve, it is essential for the EPA to fully address significant contribution responsibilities of upwind states under section 110(a)(2)(D) of the Clean Air Act.

If you have any questions about this issue, I encourage you to contact Douglas McVay or Laurie Grandchamp at the Rhode Island Department of Environmental Management’s Office of Air Resources at (401) 222-4700.

Sincerely,



Gina M. Raimondo
Governor

¹ Memo from Janet G. McCabe, Acting Assistant Administrator, US EPA, to Regional Administrators, “Area Designations for the 2015 Ozone National Ambient Air Quality Standards,” February 25, 2016.