



Alabama Department of Environmental Management
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October 3, 2014

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Ms. Heather McTeer Toney
Regional Administrator, EPA Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Dear Ms. McTeer Toney:

On August 19, 2014, after considering Alabama's March 3, 2014, designation recommendations, 2011-2013 air quality data and other relevant technical information pertaining to the 2012 annual PM2.5 NAAQS, EPA sent ADEM a letter stating its intent to designate the entire State of Alabama as unclassifiable/attainment, with the exception of Russell County, Alabama. The letter states that EPA has insufficient data to make a determination for Russell County because of insufficient monitoring data from the Georgia monitors in the Columbus, Georgia - Phenix City, Alabama area. Therefore, EPA intends to use its authority under section 107(d)(1)(B) of the Clean Air Act (CAA) to defer the designation for Russell County in order to gain an additional year of monitoring data from the Georgia monitors.

In response to EPA's intentions regarding designations for the 2012 annual PM2.5 NAAQS, ADEM has the following comments:

1. The process for designating areas following promulgation of a new or revised NAAQS is contained in CAA section 107(d)(1)(A)(i), (ii) and (iii) (42 U.S.C. 7407). This section of the CAA identifies three potential classifications: nonattainment, attainment, and unclassifiable. Given that EPA's desired designation of "unclassifiable/attainment" is not included in the CAA as a potential classification, ADEM recommends that the entire State of Alabama, including Russell County, be designated as attainment in December 2014. We believe this classification is consistent with the intent of the CAA, as 2011 through 2013 data for all monitors in the State, including the monitor in Russell County, indicate attainment of the 2012 annual PM2.5 NAAQS.
2. As was the case in our initial designation recommendations from March 2014, we again request that the entire State, including Russell County, be designated as attainment. In December 2014, EPA will be basing designations on the 2011-2013 monitoring period. The design value for the Russell County monitor for this period is 11.2 $\mu\text{g}/\text{m}^3$. While we understand that the Columbus, Georgia, monitors have insufficient data to make a designation determination for the 2011-2013 monitoring period, the data from the Russell County monitor for this period has been quality assured and accepted by EPA as valid and in compliance with the 2012 annual PM2.5 NAAQS. For this reason, we continue to request that EPA designate Russell County as attainment, with the understanding that the designation may need to be revised if the Columbus, Georgia, monitors fail to comply with the standard for the 2012-2014 monitoring period.



Please let me know if clarification is needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald W. Gore". The signature is written in a cursive style with a large, prominent initial "R".

Ronald W. Gore, Chief
Air Division

cc: Beverly Banister, EPA