



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

AUG 22 2017

The Honorable Larry Hogan  
Governor of Maryland  
100 State Circle  
Annapolis, Maryland 21401-1925

Dear Governor Hogan:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) proposed designations for certain areas in the State of Maryland for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The designations for this NAAQS are an important part of EPA's commitment to a clean, healthy environment. These proposed designations are a response to designations-related recommendations and information Maryland submitted in letters dated December 19, 2016, April 14, 2016, April 19, 2016, January 15, 2016, November 20, 2015, and April 19, 2011. The letters in April and January 2016 as well as the letter in November of 2015 primarily pertain to the Round 2 designations related to Anne Arundel County, Baltimore County, and Baltimore City.

On July 25, 2013, EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016 and November 29, 2016. In Maryland, the following two areas were designated on June 30, 2016: the Baltimore City Area, and the Anne Arundel County and Baltimore County Area which includes portions of both counties. Pursuant to a March 2, 2015 court-ordered schedule,<sup>1</sup> EPA must complete the remaining SO<sub>2</sub> designations by two specific deadlines: December 31, 2017 and December 31, 2020. Pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of EPA's assessment regarding Maryland's recommended designations for all remaining undesignated areas in Maryland. EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. Areas that are associated with sources for which Maryland elected to install and begin operating a new SO<sub>2</sub> monitoring network will be designated by December 31, 2020, consistent with the prescribed timing of the consent order. In Maryland, this applies to Allegany County.

After carefully considering Maryland's recommendations and all available information, including any air dispersion modeling analysis and current (2014-2016) air monitoring data, EPA proposes to designate the following areas as indicated below. EPA regulations for implementing the SO<sub>2</sub> NAAQS require Maryland to characterize SO<sub>2</sub> air quality in each of these listed areas. EPA proposes to designate each listed area as a separate unclassifiable/attainment area, as indicated.

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<sup>1</sup> *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

<b>Proposed Unclassifiable/Attainment Area</b>	<b>Included Counties</b>
Charles*	Charles County
Prince George's*	Prince George's County

An asterisk (\*) indicates that EPA's proposed designations for these counties represents a modification to the designation that you have recently recommended.

The Technical Support Document for our proposed designations is available at <https://www.epa.gov/sulfur-dioxide-designations>. Chapter 18 of the document addresses the State of Maryland.

In addition, EPA proposes to designate as unclassifiable/attainment all remaining areas of Maryland that were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the Enclosure.

If you or your staff have additional information that EPA should consider prior to finalizing these designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at [www.regulations.gov](http://www.regulations.gov), and sending a copy to EPA Region III. EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on EPA's proposed designations.

Thank you for Maryland's efforts throughout the designations process. We share your goal to provide cleaner air for citizens in Maryland, and we look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO<sub>2</sub> NAAQS. For additional information regarding designations under the SO<sub>2</sub> NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Ms. Kyle Zieba of my staff at 215-814-5420 or [Zieba.Kyle@epa.gov](mailto:Zieba.Kyle@epa.gov).

Sincerely,



Cecil Rodrigues  
Acting Regional Administrator

Enclosure

cc: The Honorable Ben Grumbles, Secretary  
Maryland Department of the Environment

## Enclosure

List of all remaining areas of Maryland that were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. EPA proposes to designate each of these areas as a separate unclassifiable/attainment area.

<b>Proposed Unclassifiable/Attainment Area or Partial Area (p)</b>	<b>Included Area, If Partial County</b>
Anne Arundel County (p)*	All portions of the county not located within 26.8 km of Herbert A. Wagner's Unit 3 stack which is located at 39.17765 N. latitude, 76.52752 W.
Baltimore County (p)*	All portions of the county not located within 26.8 km of Herbert A. Wagner's Unit 3 stack which is located at 39.17765 N. latitude, 76.52752 W.
Calvert County*	
Caroline County*	
Carrol County*	
Cecil County*	
Dorchester County*	
Frederick County*	
Garrett County*	
Harford County*	
Howard County*	
Kent County*	
Montgomery County*	
Queen Anne's County*	
Somerset County*	
St. Mary's County*	
Talbot County*	
Washington County*	

Wicomico County*	
Worcester County*	

An asterisk (\*) indicates that the proposed designation for this county or portion of a county represents a modification to the designation that Maryland has most recently recommended.