



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

AUG 22 2017

The Honorable Christopher T. Sununu  
Office of the Governor  
State House  
107 North Main Street  
Concord, New Hampshire 03301

Dear Governor Sununu:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for all of the remaining areas in New Hampshire 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 intended designations are a response to designations-related recommendations and information your state submitted in letters dated July 6, 2011 and December 23, 2016.<sup>1</sup>

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. The Central New Hampshire Nonattainment Area, which includes portions of Hillsborough, Merrimack, and Rockingham Counties, was one of the areas designated on July 25, 2013. No other areas in New Hampshire have yet been designated. Pursuant to a March 2, 2015 court-ordered schedule,<sup>2</sup> the agency must complete the remaining SO<sub>2</sub> designations by two specific deadlines: December 31, 2017 and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of EPA's intentions regarding your state's recommended designations for all remaining undesignated areas in New Hampshire. We are in agreement with your recommendations.

If you or your staff have additional information that the EPA should consider prior to finalizing the 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 1. 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 intended designations.

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<sup>1</sup> New Hampshire also provided information relevant to these designations in a modeling report and associated files on February 3, 2017, and in permits for Newington Station dated December 22, 2016 and Schiller Station dated June 15, 2017.

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

New Hampshire's recommendation for the entirety of Belknap, Carroll, Cheshire, Coos, Grafton, and Sullivan Counties and the remaining undesignated portions of Hillsborough and Merrimack Counties is unclassifiable/attainment, and for Strafford County and the remaining undesignated portions of Rockingham County is attainment. These areas include areas for which EPA regulations for implementing the SO<sub>2</sub> NAAQS require New Hampshire to characterize SO<sub>2</sub> air quality. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by New Hampshire or by a third party. Our review of this information indicates that it is consistent with your recommendation and we intend to designate these areas as unclassifiable/attainment. Finally, EPA also intends to designate as unclassifiable/attainment all remaining undesignated areas in New Hampshire 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.

<b>Unclassifiable/Attainment Area</b>	<b>Included Counties</b>
Belknap County	Belknap County
Carroll County	Carroll County
Cheshire County	Cheshire County
Coos County	Coos County
Grafton County	Grafton County
Remaining Portion of Hillsborough County	Hillsborough County (p)
Remaining Portion of Merrimack County	Merrimack County (p)
Sullivan County	Sullivan County
Remaining Portion of Rockingham County	Rockingham County (p)
Strafford County	Strafford County

(p) indicates portion of county

The enclosure to this letter provides the information that supports the intended designation decisions for these areas in New Hampshire.<sup>3</sup>

EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. Upon the completion of this designation action, there will be no remaining areas in New Hampshire to be designated.

We share your goal to provide cleaner air for citizens in your state. 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 [www.epa.gov/sulfur-dioxide-designations](http://www.epa.gov/sulfur-dioxide-designations). Should you have any

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<sup>3</sup> The enclosure is Chapter 27 of the Technical Support Document (TSD) for the designations EPA plans to complete by December 31, 2017 that addresses areas in New Hampshire. The TSD is also available at [www.epa.gov/sulfur-dioxide-designations](http://www.epa.gov/sulfur-dioxide-designations).

questions, please do not hesitate to call me, or have your staff contact Leiran Biton of my staff at 617-918-1267 or [biton.leiran@epa.gov](mailto:biton.leiran@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Deborah A. Szaro".

Deborah A. Szaro  
Acting Regional Administrator

Enclosure

cc: Robert R. Scott, Commissioner, NH DES  
Craig Wright, Air Resources Division Director, NH DES