

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Air Resources

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APR 30 2020

Mr. Richard Ruvo
Acting Director, Air and Radiation Division
United States Environmental Protection Agency Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Dear Mr. Ruvo:

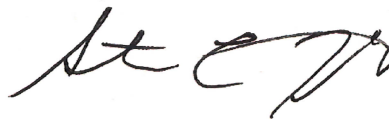
On September 5, 2019, EPA issued a Memorandum¹ providing information on the schedule and process for area designations for the 2010 SO₂ NAAQS that EPA must complete by a court-ordered² deadline of December 31, 2020 ("Round 4"). In Round 4, EPA will designate all remaining areas that have not yet been designated for the 2010 SO₂ NAAQS. This includes Cayuga, Seneca, St. Lawrence and Tompkins Counties in New York State. The designations for these four counties will be based primarily on ambient monitoring data, including data from new EPA-approved monitors that were installed and began operating by January 2017 pursuant to the federal Data Requirements Rule (DRR) around Cayuga Generating Station in Tompkins County and Alcoa in St. Lawrence County. EPA's September 5, 2019 memorandum also stipulated that states wishing to update their 2011 designation recommendation for areas that have yet to be designated should do so by May 1, 2020.

On June 1, 2011, the Department of Environmental Conservation (DEC) submitted initial designation recommendations for the 2010 SO₂ NAAQS based on air quality information that was then available. At that time, DEC recommended that Cayuga, Seneca, St. Lawrence and Tompkins Counties be designated "attainment."

DEC intends to submit a revised designation recommendation for St. Lawrence County, but will not be able to do so by May 1, 2020 due to circumstances beyond our control. Consequently, DEC requests a 60-day extension in order to provide sufficient time to finalize an updated designation recommendation.

Should you have any questions, please do not hesitate to contact me at (518) 402-8452.

Sincerely,



Steven E. Flint, PE
Director, Division of Air Resources

c: M. Sheehan
R. Bielawa

¹ From Peter Tsirigotis, Director, to Regional Air Division Directors, Regions 1 - 10

² On March 2, 2015, the U.S. District Court for the Northern District of California approved a Consent Decree between EPA and Sierra Club and Natural Resources Defense Council to resolve litigation concerning the deadline for completing the designations.