

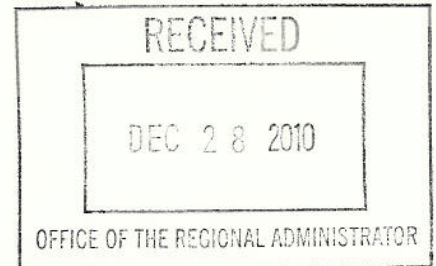


State of Rhode Island and Providence Plantations

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

Donald L. Carcieri
Governor

December 22, 2010



H. Curtis Spalding, Regional Administrator
EPA Region I
5 Post Office Square, Suite 100
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 revised National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂), which was promulgated on January 22, 2010.¹

A site is in violation of the revised NAAQS if the monitored design value at that site is greater than 100 ppb. The design value is calculated by averaging the 98th percentile maximum daily one-hour NO₂ concentrations measured at the site each year in three consecutive years. Design values for the Brown University site in Providence, the only Rhode Island NO₂ monitor that is operated year-round, for the past ten years are as follows:

Year	Design Value (ppb)
2000	66.0
2001	66.0
2002	58.0
2003	56.3
2004	54.0
2005	53.7
2006	51.7
2007	50.7
2008	48.0
2009	47.3

¹ 75 FR 6474, February 9, 2010, <http://www.epa.gov/ttn/naaqs/standards/nox/fr/20100209.pdf>

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Since those design values are consistently lower than the 100 ppb NAAQS and show a steady decrease with time, the Providence site is in monitored attainment of the revised standard. However, the revised NO₂ NAAQS requires states to site at least one monitor at a location adjacent to a busy roadway in each urban area with a population of 500,000 or greater by January 1, 2013 and specifies that the data collected at those sites, in addition to the data collected at community sites, will be used to determine attainment status. The United States Census Bureau estimates the 2009 population for the Providence-New Bedford-Fall River RI-MA Metropolitan Statistical Area as 1,600,642. Therefore, Rhode Island, which does not currently operate a near-road NO₂ monitoring site, is required to begin operation of such a site consistent with specifications in the NAAQS by January 1, 2013.

Since the NO₂ levels measured at the current community based site in Providence do not exceed the new NAAQS and since no near-road Rhode Island NO₂ data are currently available, I am recommending that Rhode Island be designated at this time as "unclassifiable" for the 2010 NO₂ NAAQS. I understand that EPA may redesignate the area to "attainment" or "nonattainment" status after 2015, when three years of data have been collected at the near-road site.

If you have any questions about this issue, please feel free to contact Barbara Morin at the Rhode Island Department of Environmental Management's Office of Air Resources at (401) 222-4700, extension 7012.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donald L. Carcieri".

Donald L. Carcieri
Governor

c/ Governor-Elect Lincoln Chafee
Janet Coit