OEP
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State of Rhode Island and Providence Plantations
State House
Providence, Rhode Island 02903-1196
401-222-2080

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OFFICE OF THE REGIONAL ADMINISTRATOR

Donald L. Carcieri
Governor

July 9, 2003

Robert W. Varney, Regional Administrator
EPA - New England, Region I
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Dear Mr. Varney:

Pursuant to the requirements of Section 107(d)(1) of the Clean Air Act Amendments of 1990 (CAAA), Rhode Island is hereby submitting its recommendation for the State's attainment status designation for the eight-hour National Ambient Air Quality Standard (NAAQS) for ozone. Section 107(d)(1) defines nonattainment areas as areas that do not meet, or that contribute to ambient air quality in a nearby area that does not meet, the NAAQS for a pollutant.

A site is in violation of the eight-hour NAAQS if the monitored design value for that site is greater than or equal to 85 ppb. The design value is calculated by averaging the fourth highest maximum daily eight-hour ozone concentration measured at a site each year in a three consecutive year period. The eight-hour ozone design values for the three Rhode Island ozone monitoring sites for the most recent three-year period, 2000 - 2002, are as follows:

Site	County	Design Value (ppb)
West Greenwich	Kent	97
Narragansett	Washington	93
East Providence	Providence	91

Since the 2000 - 2002 design values for all three of the Rhode Island monitoring sites exceed 85 ppb, the entire State of Rhode Island is in monitored violation of the eight-hour ozone NAAQS.

EPA's guidance for establishing boundaries for 8-hour nonattainment areas, which was issued on 28 March 2000, states that Consolidated Metropolitan Statistical Area (CMSA) boundaries should be used as the presumptive boundaries of a nonattainment area. The Providence-Fall

River-Warwick, RI-MA CMSA includes all of the municipalities in Providence, Kent and Bristol Counties, Rhode Island and some of the municipalities in Washington and Newport Counties, Rhode Island and Bristol County, Massachusetts.

For ease of administration, however, I am recommending that, as with the one-hour ozone NAAQS, the Rhode Island eight-hour nonattainment area be defined by the boundaries of the State of Rhode Island, rather than the boundaries of the CMSA. As such, the nonattainment area would differ from the presumptive boundaries in the following ways:

The nonattainment area would not include the following municipalities in Bristol County, Massachusetts that are in the Providence CMSA: Attleboro, Fall River, North Attleborough, Rehoboth, Seekonk, Somerset, Swansea, and Westport;

The nonattainment area would include the municipalities of Middletown, Newport and Portsmouth in Bristol County, Rhode Island and New Shoreham in Washington County, Rhode Island. Those municipalities are not part of a CMSA; and

The nonattainment area would include the municipalities of Hopkinton and Westerly in Washington County, Rhode Island, which are part of the New London-Norwich, CT-RI CMSA.

Although I am not asking that upwind areas be included in the Rhode Island nonattainment area, Rhode Island is keenly aware that the State's ozone levels are strongly influenced by upwind states' emissions. Therefore, if Rhode Island is to come into attainment with the eight-hour ozone NAAQS, it is essential for EPA to adequately address long-range transport of ozone and ozone precursors.

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.

Very truly yours,

Donald L. Carcieri
Governor

cc: Jan Reitsma, Director, RIDEM