



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR AND WASTE MANAGEMENT

OCT 7 1977

SUBJECT: Model Letter Regarding State Designation  
of Attainment Status

MEMO TO: Regional Administrators, Region I-X

FROM : David G. Hawkins, Assistant Administrator  
for Air and Waste Management

On October 6, 1977, members of your staff were notified, via telephone, of the pending revision to the model letter prepared as guidance for notification to the State agencies concerning designation of attainment/non-attainment status as required by the 1977 Clean Air Act Amendments. The language of the September 28, 1977, model letter to you has been revised regarding designation for photochemical oxidants. The attached model letter requests States to presume that all urban areas greater than 200,000 population are non-attainment areas for photochemical oxidants and encourages States to consider oxidant non-attainment designation on a State-wide basis in States east of the Mississippi River.

Please consider this model letter as representing Agency policy and proceed to notify each State.

Attachment.

cc: Air & Hazardous Materials Division Directors, Regions I,  
III-X  
Environmental Programs Division Director, Region II  
Air Branch Chiefs, Regions I-X

### Total Suspended Particulates

The area should be designated attainment when a TSP violation can be clearly attributed to rural fugitive dust (as defined in the EPA fugitive dust policy paper).

### Total Suspended Particulates and Sulfur Dioxide

In cases where an area is unclassifiable or is designated as attainment, major new or modified sources must be reviewed to ensure consistency with PSD requirements.

### Carbon Monoxide

Specific areas covered by monitors showing violations should be designated as non-attainment. However, SIP revisions covering larger geographic areas may be necessary to solve the non-attainment problem.

### Photochemical Oxidants

It is well established that the high concentrations of oxidant precursors and the ratio of hydrocarbons to nitrogen oxides typically found in major urban areas is conducive to formation of photochemical oxidants. For example, measured data from cities with urbanized area populations exceeding 200,000 show violations of the oxidant standard for all areas where data are available. Data are available for almost all urbanized areas that exceed 200,000 population. Accordingly, non-attainment can, and should be presumed for all such urbanized areas, even for those few urbanized areas that do not have measured data. Since oxidant levels well in excess of the oxidant standard have been shown to persist for many miles downwind of urban areas, the area designated as non-attainment around urban areas should reflect this phenomenon.

Because urban areas are relatively numerous east of the Mississippi River, there are few, if any, areas that are not affected by an urban oxidant plume. Available rural monitoring data support this conclusion. Rather than designating areas as unclassifiable, States east of the Mississippi River are encouraged to designate their State non-attainment (which probably reflects the actual case). The fact that ozone is transported from urban areas will be explicitly recognized in the development of policies related to SIP content and approval. Additional monitoring will be required for areas designated as unclassifiable pursuant to Section 107 (d)(1)(E). If data showing non-attainment become available, the appropriate change to the attainment status must be made.

The Act requires that States submit designations to EPA by December 5, 1977. EPA must then promulgate the lists in the Federal Register by February 3, 1978, with any modifications as necessary. When any modification to the list is proposed by the Administrator, the affected State will be notified and provided an opportunity to demonstrate why the proposed modification is inappropriate. EPA will compile all State lists with all modifications as may be necessary and publish as required by the Act.

Section 103 of the 1977 Clean Air Act Amendments

FORMAT A for Designating TSP and SO<sub>2</sub>

Designated Area	Primary Standard Exceeded Section (d)(1)(B)	Secondary Standard Exceeded Section (d)(1)(C)	Unclassifiable Section (d)(1)(D)	Attainment
Area designated can be an AQCR, county or other defined geographic area				

FORMAT B for Designating CO/O<sub>x</sub>/NO<sub>2</sub>

Designated Area	Primary Standard Exceeded Section (d)(1)(A)	Unclassifiable Section (d)(1)(E)	Attainment Section (d)(1)(E)
Area designated can be an AQCR, county or other defined geographic area			

INSTRUCTIONS:

Format A is to be used for designating the attainment status for TSP and SO<sub>2</sub> required by Section 103 (d)(1)(B); Section 103 (d)(1)(C) and Section 103 (d)(1)(D).

Format B is to be used for designating the attainment status for CO, oxidants and NO<sub>2</sub> required by Section 103 (d)(1)(A) and Section 103 (d)(1)(E).

A separate table is to be used for designating the status of each pollutant. An "x" is to be used to indicate the appropriate status of each pollutant using at least the most recent four consecutive quarters of air quality data or modeling data where applicable.