



MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101

Martin O'Malley
Governor

Shari T. Wilson
Secretary

Anthony G. Brown
Lieutenant Governor

Robert M. Summers, Ph.D.
Deputy Secretary

RECEIVED

DEC 26 2007

Air Protection Division (3AP21)

December 5, 2007

Judith M. Katz, Air Director
Air Protection Division
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Dear *Judy* Ms. Katz:

In accordance with the Early Action Compact (EAC) protocol, the Maryland Department of the Environment (MDE) is submitting this letter to fulfill the final required EAC milestone for the Washington County, Maryland EAC area. The EAC for Washington County is a joint effort of Washington County, the MDE and the Maryland Department of Transportation (MDOT). On April 15, 2004, the EPA officially designated Washington County as an EAC area and deferred the 8-hour ozone nonattainment designation, provided that all EAC milestones are met and attainment can be demonstrated by December 31, 2007. Based on EPA guidance for the EACs dated April 4, 2003, Washington County will have met all milestones of the EAC with the submission of this letter and attached data certification letters.

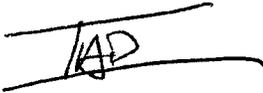
The EAC/Plan Final Report that was submitted to the EPA on March 25, 2004, contained a final list of control measures that were chosen for the Action Plan. This correspondence represents the required milestone report, due on December 31, 2007, which demonstrates attainment of the 8-hour ozone national ambient air quality standard (NAAQS). The State of Maryland and Washington County have and will continue to implement all applicable control measures through December 2007. A detailed attainment demonstration and list of control measures are provided as attachment A of this letter.

The MDE has certified that the 2005 through 2007 ozone season monitoring data for the Washington County, Maryland EAC area has been quality assured and shows attainment with the 1997 8-hour ozone national ambient air quality standard (NAAQS). Based on the current design value of 0.079 parts per million, Washington County is in attainment of the 8-hour standard. The MDE data certification letter, AMP 255, and AMP 450 reports are provided as attachment B of this letter.

Judith M. Katz
Page 2

Maryland thanks EPA for its open dialogue and support throughout the EAC process. We strongly believe that Maryland's air quality policies and regulations have significantly improved not only the air quality and health and safety of Maryland's citizens, but also the citizens of areas downwind of Maryland. If you or your staff have any questions concerning the issues identified in this letter, please contact Randy E. Mosier, Chief of the Air Regulation Development Division, at (410)-537-4488.

Sincerely,

A handwritten signature in black ink, appearing to read "TAD", is written over a horizontal line. The signature is stylized and somewhat cursive.

George (Tad) S. Aburn, Jr., Director
Air and Radiation Management Administration

Attachments

cc: Ms. Shari T. Wilson, Secretary, The Maryland Department of the Environment (MDE)
Mr. John F. Barr, President, Washington County Commissioners
Ms. Ellen Wentworth, Environmental Protection Agency, Region III
Mr. Walter Wilkie, Chief, Air Quality Analysis, Environmental Protection Agency, Region III
Mr. David Lutz, Data Certification Contact, Environmental Protection Agency, RTP

ATTACHMENT - A



**BOARD OF COUNTY COMMISSIONERS
OF WASHINGTON COUNTY, MARYLAND**

Washington County Administration Building
100 West Washington Street, Room 226
Hagerstown, Maryland 21740-4735
Telephone: 240-313-2200
FAX: 240-313-2201
Deaf and Hard of Hearing call 7-1-1 for Maryland Relay

John F. Barr, *President*
Terry L. Baker, *Vice-President*
Kristin B. Aleshire
James F. Kercheval
William J. Wivell

November 27, 2007

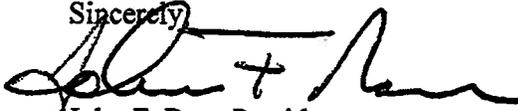
Mr. Tad Aburn, Air Director
Air and Radiation Management Division
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Endorsement to Re-designate Washington County, MD to attainment status
for the critical pollutant Ozone

Dear Mr. Aburn:

In March 2004, Washington County, in cooperation with the Maryland Department of the Environment (MDE) and the Maryland Department of Transportation (MDOT), submitted an Early Action Plan (EAP) Final Report that contained a final list of control measures that were to be implemented as part of the Action Plan in an effort to reduce emissions that lead to the development of ozone. The EAP Final Report was accepted by the US Environmental Protection Agency (EPA) and Washington County was officially designated as an EAC area with a deferred 8-hour ozone non-attainment area status on April 15, 2004. Over the course of the last several years, Washington County has dutifully implemented the local control measures established in the Final EAP and has attained all of the milestones for reporting as stipulated by the US EPA guidance for EAC's dated April 4, 2003. Based on the monitor data supplied by MDE for the 2005 through 2007 ozone seasons, we hereby endorse MDE's request to the US EPA to re-designate Washington County as being in attainment for the 8-hour standard for the critical pollutant ozone. Should you have any questions regarding this endorsement, please contact Jill Baker in the Washington County Planning Department at (240) 313-2433.

Sincerely,



John F. Barr, President
Board of County Commissioners for
Washington County, Maryland

Cc: Randy Mosier, MDE
Howard Simons, MDOT
Mike Nixon, MDOT
Jim Frasier, Michael Baker Corp. Inc.



Washington County, Early Action Plan

December, 2007
Attainment Demonstration



Submitted to:

United States Environmental Protection Agency
Region 3, Air Protection Division
1650 Arch Street
Philadelphia, Pennsylvania 17108-1086

Prepared by:



Board of County Commissioners of Washington County, Maryland
100 W. Washington St.
Hagerstown, Maryland 21740



Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230



Maryland Department of Transportation
7201 Corporate Center Drive, PO Box 548
Hanover, MD 21076

Baker

Michael Baker Jr., Inc.
1304 Concourse Drive, Ste. 200
Linthicum, Maryland 21090

December 31, 2007

Early Action Plan Milestone Report Attainment Demonstration

The Early Action Compact/Plan (EAC/EAP) Final Report to the EPA, due on March 31, 2004, and submitted on March 25, 2004, contained a final list of control measures that were chosen for the Action Plan. This correspondence represents the required milestone report, due on December 31, 2007, which demonstrates attainment of the 8-hour ozone national ambient air quality standard (NAAQS).

The EAC is a joint effort of Washington County (the County), the Maryland Department of the Environment (MDE) and the Maryland Department of Transportation (MDOT). On April 15, 2004, the EPA officially designated Washington County as an EAC area and deferred the 8-hour ozone nonattainment designation, provided that all EAC milestones are met and attainment can be demonstrated by December 31, 2007.

Based on EPA guidance for the Early Action Compacts dated, April 4, 2003, Washington County has met all milestones of the EAC. The table below provides a summary of the milestones that have been completed.

Early Action Plan Milestones

Date	Description	Complete?
December 31, 2002	Initial EAP	<input checked="" type="checkbox"/>
June 16, 2003	Potential local emission reduction strategies identified and described.	<input checked="" type="checkbox"/>
June 30, 2003	Six-month progress report submitted.	<input checked="" type="checkbox"/>
December 31, 2003	Detailed discussion of local emission reductions strategies submitted.	<input checked="" type="checkbox"/>
March 31, 2004	Washington County will complete proposed Ozone Action Plan and submit to AQCC for review.	<input checked="" type="checkbox"/>
June 30, 2004	Progress report for updates to the March 31 st submittal	<input checked="" type="checkbox"/>
December 31, 2004	Semi-annual EAC progress report identifying progress, schedules, and changes to EAP	<input checked="" type="checkbox"/>
December 31, 2004	MDE in cooperation with Washington County will incorporate EAP into SIP and submit to EPA.	<input checked="" type="checkbox"/>
February 28, 2005	Washington County EAC SIP Addendum submitted to EPA	<input checked="" type="checkbox"/>
May 3, 2005	EPA's Approval and Promulgation of Air Quality Implementation Plans; Maryland; Attainment Demonstration for the Washington County Early Action Compact Area.	<input checked="" type="checkbox"/>
May 17, 2005	Notice of Proposed Rulemaking was published in the Federal Register, officially starting the 30-day public comment period.	<input checked="" type="checkbox"/>
June 16, 2005	Public comment period ends and pending comments, EPA expected to approve EAC in July 2005.	<input checked="" type="checkbox"/>
June 30, 2005	Submit the semi-annual progress report.	<input checked="" type="checkbox"/>
December 31, 2005	Washington County implements the local control measures that have been incorporated into the SIP. Submit the semi-annual progress report.	<input checked="" type="checkbox"/>
June 30, 2006	Washington County certifies progress toward attainment since previous milestone, e.g., continued implementation and progress toward improvement in air quality and emissions reductions.	<input checked="" type="checkbox"/>
December 31, 2006	Submit the semi-annual progress report.	<input checked="" type="checkbox"/>
June 30, 2007	Submit the semi-annual progress report.	<input checked="" type="checkbox"/>
December 31, 2007	Washington County attains the 8-hour ozone NAAQS.	<input checked="" type="checkbox"/>

Summary of Washington County December 31, 2007 Attainment Demonstration

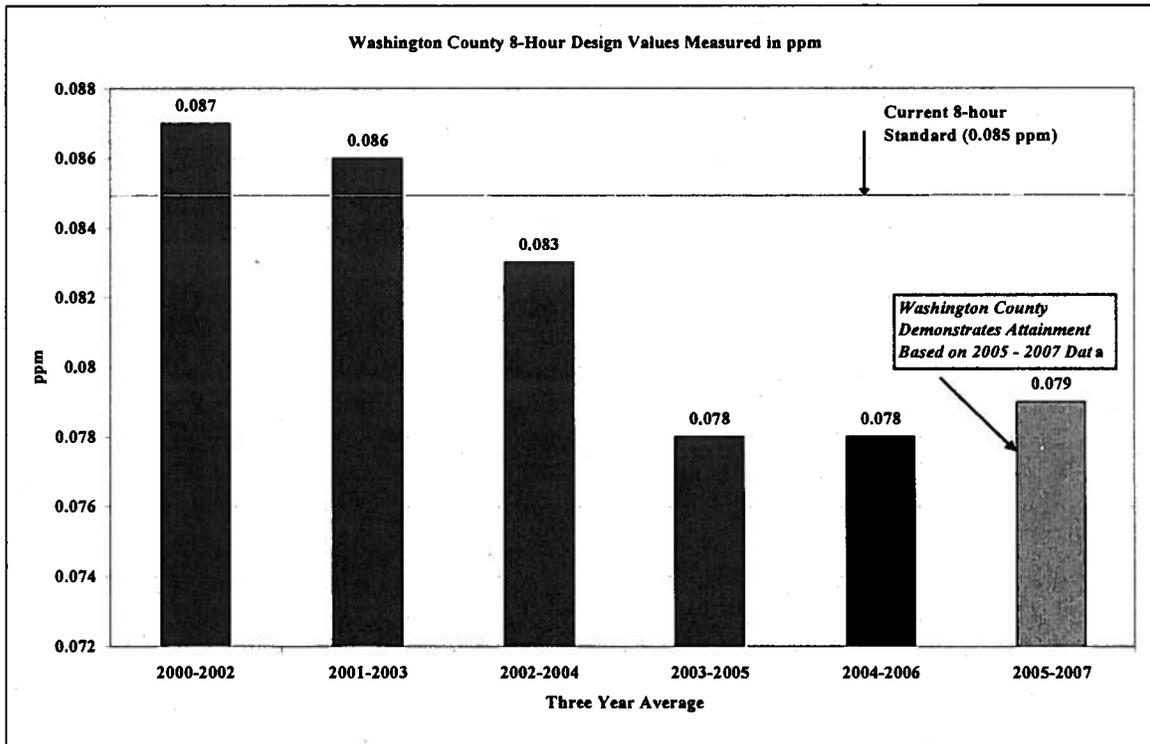
Following, is a summary of the implementation progress, air quality improvements and control measures which were outlined in the Final EAP submitted on March 31, 2004.

Implementation Progress

All federal, state and local control measures were effectively implemented at the time of the December 31, 2005 Progress Report submittal.

Air Quality Improvements

Air quality improvements in Washington County can be measured utilizing air quality monitor data obtained from the Washington County ozone monitor, which is located on Roxbury Road in Hagerstown at the Maryland Correctional Institute. The design value for the 8-hour ozone standard is based on the 4th highest ozone reading for each year and averaged over three years. The 8-hour ozone standard is 0.085 parts per million (ppm). As evidenced by the downward trend in design values, Washington County has made significant progress toward reaching its air quality goals (see graph below).



Based on the current design value, 2005-2007 above, Washington County is in attainment of the 8-hour standard.

Following is the list of the Action Plan Control Measures. The measures are divided into two main categories: State and Local control measures and Federal control measures. The emission reduction credit taken for each measure is also listed in the tables below.

1. State and Local Measures:

All control measures, falling under the State and Local control measures category, are already in place. A complete description of each measure is provided in Appendix A. The table below summarizes these measures and credits taken.

State and Local Control Measures – Summary Table

Control Measures	Emissions Reductions	
	VOC (Kg/day)	NO _x (Kg/day)
Ride-Matching/Commuter Connections	1.52	1.44
Park & Ride Lots	2.92	3.04
1. Telework Center	0.19	0.22
2. Telecommuting	2.87	3.12
Air Quality Action Days	Voluntary Program - No credit taken	
Clean Air Partners/Public Education Outreach	Voluntary Program - No credit taken	
Transit Programs in Washington County		
1. County Commuter Bus Services (9 routes)	5.30	4.19
2. Turning Point Transit Services	0.43	0.41
3. Commuter Bus Service from Hagerstown to Shady Grove Metro Station	1.65	1.75
E-government/E-commerce Enhancements	1.59	0.31
Fuel & Vehicle Task Group	Credit not taken.	
Growth Management Program	13.24	15.42
Signal System Enhancements		
1. US-40: Cleveland Ave. to Edgewood Rd.		
2. MD-65: Doub Way to Henry Douglas Dr.	6.00	1.81
3. US-11:		
▪ Penn. Ave. at Northern Ave.	4.22	1.27
▪ Penn. Ave. at Fariview Rd. – Park Ln.	9.57	3.06
▪ Penn. Ave. at Prospect St.		
▪ Burhans Blvd. at Park Ln.		
Incident Management/Intelligent Transportation Systems (ITS)	17.59	7.99
1. Highway Advisory Radio (3 locations)		
On-Road Vehicle Acquisitions		
1. Fleet Replacement (SHA - 2 vehicles)	0.01	0.01
2. Transit Fleet Replacement	- 0.02	13.6
3. Transit Engine Re-build	1.49	0.00
4. Fleet Replacement (MTA - 1 vehicle)	0.00	0.00
Vehicle Emissions Inspection Program (VEIP)	480.81	562.46
OTC Programs		
1. Consumer Products	108.86	0.00
2. Architectural and Industrial Maintenance	92.18	0.00
3. Portable Fuel Containers	54.43	0.00
Low Emissions Paint	26.28	0.00
Off-Road Vehicle Replacement	Credit not taken, as it is not quantifiable	
RACT Controls	0.00	1,312.31

Note: Positive numbers imply reduction in emissions and negative numbers imply increase in emissions.

2. Federal Control Measures

This section identifies the control measures implemented and regulated at the federal level. They include engine standards, fuel requirements, and stationary source controls that have been implemented as of the submittal of this document. The federal control measures, outlined in the summary table below, will apply to Washington County and the entire state of Maryland. Please see Appendix A for a complete description of each measure.

Federal Control Measures – Summary Table

Measure	Emissions Reductions	
	VOC (Kg/day)	NO _x (Kg/day)
NLEV	81.65	99.79
Tier II	780.18	2,821.35
HDE Standard	0.00	172.37
Phase I & II Engine Standards	Credit not taken. Expected VOC benefit = 30% reduction by 2005.	
Engine Standards for Diesel Powered Engines	Credit not taken. Expected NO _x benefit = 25% reduction in new engines by 2005.	
Engine Standards for Gasoline Powered Marine Engines	Credit not taken. Expected VOC benefit = 25% reduction in new engines by 2005.	
Engine Standards for Large Gasoline Powered Engines	Credit not taken. Expected VOC benefit = 20% reduction by 2005. Expected NO _x benefit = 20% reduction by 2005.	
Engine Standards for Locomotive Engines	Credit not taken. Expected VOC benefit = 30% reduction by 2005. Expected NO _x benefit = 30% reduction by 2005.	
NO _x SIP Call	Credit not taken. Expected NO _x benefit = 53% reduction from 2003 levels by 2009.	

Acronyms :

1. AQAC - Air Quality Advisory Committee
2. AQAD - Air Quality Action Days
3. BMC - Baltimore Metropolitan Council
4. CAP - Clean Air Partners
5. CCTV - Closed Circuit Television
6. CHART - Coordinated Highways Action Response Team
7. DMS - Dynamic Message Signs
8. EAC - Early Action Compact
9. EAP - Early Action Plan
10. EPA - Environmental Protection Agency
11. FHWA - Federal Highway Administration
12. HAR - Highway Advisory Radio
13. HDE - Heavy Duty Engines
14. HEPMPO - Hagerstown/Eastern Panhandle Metropolitan Planning Organization
15. ITS - Intelligent Transportation Systems
16. ISC - Interstate Council
17. IVR - Interactive Voice Response
18. MDE - Maryland Department of Environment
19. MDOT - Maryland Department of Transportation
20. MTA - Maryland Transit Administration
21. MVA - Motor Vehicle Administration (Maryland)
22. MWCOG - Metropolitan Washington Council of Governments
23. NAAQS - National Ambient Air Quality Standards
24. NLEV - National Low Emissions Vehicle
25. NO_x - Oxides of Nitrogen
26. OTR - Ozone Transport Region
27. RACM - Reasonably Available Control Measures
28. RACT - Reasonably Available Control Technologies
29. SHA - State Highway Administration (Maryland)
30. SIP - State Implementation Plan
31. TAC - Technical Advisory Committee
32. VDOT - Virginia Department of Transportation
33. VEIP - Vehicle Emissions Inspection Program
34. VMT - Vehicle Miles Traveled
35. VOC - Volatile Organic Compounds

ATTACHMENT - B



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Lieutenant Governor

Robert M. Summers, Ph.D.
Deputy Secretary

November 26, 2007

Mr. David Lutz
Data Certification Contact
US EPA (D243-02)
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Mr. Lutz:

Hagerstown, Maryland's 2007 ozone data and quality assurance data have been completely submitted to Aerometric Information Retrieval Systems (AIRS). The ozone data are accurate to the best of the Data Management and Quality Assurance Division, Air Monitoring Program, Air and Radiation Management Administration's knowledge taking into consideration the quality assurance findings.

As the senior air pollution official for the State of Maryland, I agree with the Data Management and Quality Assurance Division's assessment of Hagerstown 2007 ozone data. I request that the data be included as certified official data for Maryland in AIRS and be used for the December 2007 Progress Report for Washington County Early Action Compact.

Sincerely,

George (Tad) Aburn, Director
Air and Radiation Management Administration

cc: Edwin Gluth





MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Robert M. Summers, Ph.D.
Deputy Secretary

November 30, 2007

Judith Katz, Director
Air Protection Division
U.S. EPA Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Katz,

Please find in this packet the Hagerstown, Washington County Maryland 2007 AMP255 and AMP450 ozone reports and the Hagerstown Early Action Compact ozone data certification letter. The certification letter is addressed to Mr. David Lutz, Data Certification Contact EPA and signed by George Aburn, Director Air and Radiation Management Administration, Maryland Department of the Environment. The two reports will be emailed to you. Then the letter and reports will be mailed to you via US Postal mail.

If you have any questions, please contact me.

Sincerely,

Edwin C. Gluth, Head
Data Management and Quality Assurance Division
Ambient Air Monitoring Program
Air and Radiation Management Administration
(410) 537-3871
egluth@mde.state.md.us

ECG/jml

Enclosure

cc: Tad Aburn
David Krask
Randy Mosier



Hagerstown, Maryland 2007 Ozone AMP255 Report

Table E. Single Point Quality Check Completeness for O3, 2007:Q2-Q4.

Region	State	PQAO	Monitor Type	Site ID	Start Date	End Date	Number Required	Number Submitted	Comp. %	% Sites <50% Complete
3	MD	1002	SLAMS	240430009	4/1/2007	10/31/2007	15	14	93	NA
3	MD	1002	All - NSP	NA	NA	NA	15	14	93	0

Hagerstown, Maryland 2007 Ozone AMP255 Report

Table F. Performance Evaluation Check Completeness for O3, 2007:Q2-Q4.

Region	State	PQAO	Monitor Type	Site ID	Start Date	End Date	Number Required	Number Submitted	Comp. %	Tot. # of Sites	Audits in Quarters 1/2/3/4
3	MD	1002	SLAMS	240430009	4/1/2007	10/31/2007	1(3)	2(6)	100(100)	NA	NA
3	MD	1002	All - NSP	NA	NA	NA	3(9)	2(6)	100(100)	1	0/1/0/1

Hagerstown, Maryland 2007 Ozone AMP255 Report

Table U. Single Point Precision and Bias Estimates for O3 NSP Sites, 2007:Q2-Q4.

Region	State	PQAO	Site	CFR Lower Limit	CFR Upper Limit	Bias UB	CV UB
3	MD	1002	240430009	NA	NA	-1.15	1.59
3	MD	1002	All - NSP	-2.44	2.15	-1.15	1.59

Table W. Single Point Precision and Bias Estimates for O3 Non-NSP Sites, 2007:Q2-Q4.

Region	State	PQAO	Site	CFR Lower Limit	CFR Upper Limit	Bias UB	CV UB
--------	-------	------	------	-----------------	-----------------	---------	-------

Table Y. PQAO Accuracy Summary for O3 NSP Sites, 2007:Q2-Q4.

Region	State	PQAO	I	II	III	IV		
3	MD	1002		(+1.8	+3.4)	(+1.8	+3.2)	

Table Z. PQAO Accuracy Summary for O3 Non-NSP Sites, 2007:Q2-Q4.

Region	State	PQAO	I	II	III	IV
--------	-------	------	---	----	-----	----

User ID: NZY

QUICKLOOK CRITERIA PARAMETERS

Report Request ID: 483415

Report Code: AMP450

Nov. 20, 2007

GEOGRAPHIC SELECTIONS															
Tribal	State	County	Site	Parameter	POC	City	AQCR	UAR	MSA	CMSA	EPA Region	Method	Duration	Begin Date	End Date
	24	043	0009	44201	1									2007	2007

SELECTED OPTIONS	
Option Type	Option Value
EVENTS PROCESSING	EXCLUDE REGIONALLY CONCURRED EVENTS
MERGE PDF FILES	YES

SORT ORDER	
Order	Column
1	PARAMETER_CODE
2	STATE_CODE
3	COUNTY_CODE
4	SITE_ID
5	POC
6	DATES
7	EDT_ID

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

Nov. 20, 2007

EXCEPTIONAL DATA TYPES

EDT	DESCRIPTION
0	NO EVENTS
1	EVENTS EXCLUDED
2	EVENTS INCLUDED
3	EXCEPTIONAL EVENTS EXCLUDED
4	NATURAL EVENTS EXCLUDED
5	EVENTS WITH CONCURRENCE EXCLUDED
6	EXCEPTIONAL EVENTS WITH CONCURRENCE EXCLUDED
7	NATURAL EVENTS WITH CONCURRENCE EXCLUDED

Note: The * indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 QUICK LOOK REPORT (AMP450)

Nov. 20, 2007

Ozone (44201)

Maryland

Parts per million (007)

1-HOUR

SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	MEAS	VALID DAYS	NUM DAYS	1ST	2ND	3RD	4TH	DAY	EST	MISS	CERT	EDT
											MAX	MAX	MAX	MAX	MAX>/=	DAYS>/=	DAYS<		
24-043-0009	1	1002	Hagerstown	Washington	18530 ROXBURY ROAD, HAGERSTOWN, WASHINGTON CO., MARYLAND	2007	047	214	214	.102	.097	.093	.092	0	0.0	0	0	0	0

Note: The * indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 QUICK LOOK REPORT (AMP450)

Nov. 20, 2007

Ozone (44201)

Maryland

Parts per million (007)

8-HOUR

SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	%OBS	VALID	NUM	1ST	2ND	3RD	4TH	DAY	0.085	CERT	EDT
									DAYS	DAYS	MAX	MAX	MAX	MAX	MAX			
									MEAS	REQ	8-HR	8-HR	8-HR	8-HR				
24-043-0009	1	1002	Hagerstown	Washington	18530 ROXBURY ROAD, HAGERSTOWN, WASHINGTON CO., MARYLAND	2007	047	100	214	214	.085	.084	.082	.081	1			0

Note: The * indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

Nov. 20, 2007

METHODS USED IN THIS REPORT

PARAMETER	METHOD CODE	COLLECTION METHOD	ANALYSIS METHOD
44201	047	INSTRUMENTAL	ULTRA VIOLET

Note: The * indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

Nov. 20, 2007

PQAOS USED IN THIS REPORT

PQAOS	AGENCY DESCRIPTION
1002	State Of Maryland Air Management Administration

Note: The * indicates that the mean does not satisfy summary criteria.