

American Lung Association
Environmental Defense
Clean Air Trust Education Fund
Natural Resources Defense Council
Clean Air Task Force
U.S. Public Interest Research Group

June 16, 2004

Jeffrey R. Holmstead
Assistant Administrator for Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. (Mailcode 6101A)
Washington, D.C. 20460

Dear Mr. Holmstead:

The undersigned public health and environmental organizations are writing to convey our serious concerns about the states' recommendations for the air quality designations for particulates of 2.5 microns in size or smaller (PM_{2.5}). An alarming number of the recommendations contravene the law, EPA's long-standing policy, good science, and basic common sense.

Indeed, numerous states have recommended designations based only on the county with monitored violations. The nonattainment designations serve two essential public health functions. First, they establish the framework for air quality management plans across the country to address harmful particulate pollution levels. Second, the nonattainment designations tell parents whether they are raising their families in a community with unhealthy air. If EPA further advances the narrow approach recommended by some states, the nation would suffer severe public health consequences. It would, simply put, undermine the fundamental purposes of the nonattainment designations.

The analysis below identifies numerous deficiencies in the states' recommendations that threaten the nation's pressing need to protect public health and lower the harmful concentrations of PM_{2.5}. We note that in many cases a single area may have several different deficiencies. The failure to provide adequate designations for the health-based PM_{2.5} standard will postpone critical pollution reductions, delay timely attainment, and prolong the exposure of children and other vulnerable populations to unhealthy levels of particulate pollution.

We respectfully urge EPA to correct these deficiencies.

PRESUMPTIVE NONATTAINMENT BOUNDARIES THAT CONSTITUTE THE FULL C/MSAS ARE ESSENTIAL TO PROTECT PUBLIC HEALTH FROM HARMFUL PARTICULATE POLLUTION

EPA's August 29, 2003 draft staff assessment of the policy implications of scientific and technical information about particulate matter or "staff paper," acknowledges that there is a large body of new health effects studies for particulates (PM), indicating further evidence of the serious adverse health effects of the pollutant. These studies are based on epidemiologic, toxicological, controlled human exposure, and dosimetry analyses.¹ Any delay in attainment of the PM_{2.5} national ambient air quality standard will prolong these sensitive groups' exposure to unhealthy particulate pollution levels.

Unfortunately, many states have proposed nonattainment designations for the PM_{2.5} standard that do not encompass all counties in a Metropolitan Statistical Area or Consolidated Metropolitan Statistical Area (C/MSA) within which a monitored violation of the standard has occurred. These recommendations are contrary to the Clean Air Act, lacking in any reasoned basis, and must be rejected in the absence of a compelling technical justification for the smaller boundary.

The failure of EPA to promulgate protective nonattainment designations would threaten vital public health protections. Many urban centers are surrounded by rapidly expanding suburban counties. Timely attainment of the PM_{2.5} standard will depend on comprehensive boundaries that ensure that all pollution sources, both existing and new, are subject to effective air pollution abatement measures. In the absence of a nonattainment designation for the entire C/MSA, both existing air pollution sources and growth in counties that have been designated attainment or unclassifiable will result in increased air pollution just outside the core nonattainment counties. This unchecked air pollution could dramatically undercut the emission reductions progress being made in the core designated counties. And this would mean that critical progress in lowering particulate pollution levels will be stymied.

Narrow boundaries will also unfairly distribute pollution control burdens among sources that contribute to the nonattainment problem. The private firms in the counties designated nonattainment will have to make additional pollution reductions to compensate for pollution abatement strategies that do not in fact encompass all contributing pollution sources. Comprehensive boundaries will, by contrast, help ensure all contributing sources are responsible for their share of pollution reductions.

Accordingly, section 107(d)(1)(A)(i) of the Clean Air Act (CAA) requires that all areas that do not meet the NAAQS or that contribute to ambient air quality in a nearby area that does not meet the standard should be designated nonattainment. *See* 42 U.S.C. §7407(d)(1)(A)(i). EPA's April 1, 2003 memo providing guidance to states ("Designations for the Fine Particle National Ambient Air Quality Standards") advised states to designate nonattainment boundaries that encompass all counties in the C/MSA. EPA's memorandum finds: "The presumptive use of metropolitan area boundaries to define urban nonattainment areas is based on recent evidence

¹ EPA-452/D-03-001, August 2003, First Draft, 100.

that violations of the PM_{2.5} air quality standards generally include a significant urban-scale contribution as well as a significant larger-scale regional contribution.”

Because C/MSAs generally experience higher particulate pollution due to population density, traffic and commuting patterns, commercial and industrial development and area growth, EPA’s presumptive boundary is integral to ensure protection of public health from the adverse effects of particulate pollution. Given the compelling rationale for the presumptive boundary, EPA put the burden of proof on states to establish why certain counties in a C/MSA should not be designated nonattainment. In its memorandum, EPA listed important factors that states need to address to overcome the C/MSA presumptive boundary. Without a compelling and well-documented scientific justification, EPA should reject any state recommendation that does not in fact follow the well-grounded C/MSA presumption.

EPA MUST CORRECT THE EXTENSIVE DEFICIENCIES IN STATE RECOMMENDED DESIGNATIONS FOR THE PM_{2.5} STANDARD

We have performed an extensive review of the state recommendations for air quality designations under the PM_{2.5} standard. We have identified fundamental flaws with the recommended designations. As noted, section 107(d)(1) of the CAA requires that all areas that do not meet the NAAQS or that contribute to ambient air quality in a nearby area that does not meet the standard should be designated nonattainment. *See* 42 U.S.C. §7407(d)(1)(A)(i). Many states have recommended PM_{2.5} nonattainment designations that contravene this core statutory requirement. We have far-reaching concerns about these deficiencies and their long-term effects on attainment of the PM_{2.5} NAAQS.

We urge you to correct the following categories of deficiencies that are contrary to law, science and policy:

- ❖ Failure to recommend a county monitoring violations of the PM_{2.5} standard as nonattainment;
- ❖ Exceedingly narrow “spot” boundaries that encompass only the immediate area around the monitored violation;
- ❖ Failure to recommend all counties within a C/MSA or multi-jurisdictional areas as nonattainment;
- ❖ Failure to recommend nearby counties that are likely contributing to PM_{2.5} violations;
- ❖ Failure to recommend comprehensive nonattainment areas that include the C/MSA and adjacent counties that are monitoring violations;
- ❖ Splitting interstate and intrastate areas;
- ❖ Failure to base the nonattainment boundaries on the updated 2003 OMB metropolitan boundaries; and

- ❖ Recommending attainment/unclassifiable boundaries that are separated into multiple small checkerboard areas to severely undermine the statutory protections of the PSD increments.

EPA Must Designate as Nonattainment Those Counties and C/MSAs Monitoring Violations of the PM_{2.5} Standard

Section 107(d)(1)(A)(i) unambiguously defines as “nonattainment” those areas violating the PM_{2.5} standard. The statute provides no exceptions. It would be a patent violation of the Clean Air Act for EPA to fail to designate as nonattainment those counties with monitored PM_{2.5} NAAQS violations. An example of state recommendations that must be corrected by EPA are those put forward by Kentucky for Boyd County, part of the Huntington-Ashland, WV-KY-OH MSA.

We are likewise concerned that in some instances monitors have been relocated or terminated in areas that were poised to violate the PM_{2.5} standard. We must ensure that public health is fully protected in any area where a violation was prematurely avoided due to changes in monitoring. For example, the monitor in Tippecanoe County, Indiana, (part of the Lafayette MSA and near the violating Indianapolis-Anderson-Columbus CMSA) was moved after recording a 15.4 µg/m³ average for 2000-02 with incomplete data.

EPA Must Designate Comprehensive PM_{2.5} Nonattainment Boundaries and Reject Narrow “Spot” Boundaries

In a number of instances states have recommended that only very small “spot” areas be designated as nonattainment. These recommendations contravene the Clean Air Act, EPA’s boundary guidance, and basic tenets of reasoned decision-making. There are many examples of deficient “spot” nonattainment boundaries. We urge EPA to correct all such deficiencies including, for example, Jefferson County, Alabama; Davidson County, North Carolina and York County, Pennsylvania. Many other examples are noted below.

PM_{2.5} is a far-reaching, regional pollution problem. Such narrow boundaries both fail to encompass the true extent of unhealthy particulate concentrations and the contributing pollution sources (both existing and predicted growth). EPA must reject these unprotective small area designations and ensure that entire counties and affected C/MSAs are designated as nonattainment.

EPA Must Ensure that All Counties within a C/MSA or Multi-jurisdictional Areas Are Designated Nonattainment

Many states have failed to comply with the law and EPA’s policy calling for presumptive C/MSA boundaries. At core, EPA has called for nonattainment boundaries to encompass the entire C/MSA to ensure the public health protection that results from comprehensive, sound air quality management, and to ensure that all sources that contribute to PM_{2.5} nonattainment problems bear their fair share of the clean up costs. We have found a similar deficiency for those recommendations related to intrastate multi-jurisdictional areas where certain areas have been

split off from the recommendations. Again, comprehensive boundaries are integral to effective planning, public health protection and inter-governmental coordination.

We urge EPA to ensure, for example, comprehensive boundaries for the Los Angeles-Long Beach-Riverside, California CMSA, the Atlanta-Sandy Springs-Marietta, GA-AL CMSA and the Louisville-Elizabethtown-Scottsburg, KY-IN CMSA. Many other examples are described further below.

EPA must ensure that the entire C/MSAs and multijurisdictional areas are designated nonattainment, or ensure that the state has in fact adduced a compelling basis for less protective boundaries.

Consistent with the Clean Air Act, EPA Must Designate as Nonattainment All Areas that Contribute to Nonattainment in a Nearby Area Even if Such Area is Outside of the Formal C/MSA Boundaries

In many cases, counties adjacent to violating areas include high emissions of primary particulates, SO₂, VOCs and/or NO_x and are contributing to nonattainment in the C/MSA that is being recommended for nonattainment designation. However, a significant number of states have recommended separate designations for such areas, even if such areas are also violating the PM_{2.5} NAAQS, rather than including those counties as part of the larger C/MSA nonattainment area. Comprehensive, protective boundaries will ensure coordinated air quality management and planning, and reasoned, integrated redesignation requests.

For example, Alabama recommended that Jefferson County, part of Birmingham-Hoover-Cullman CMSA, be designated as a separate nonattainment area. Not only should this entire CMSA be a single nonattainment area, but the adjacent Etowah County, with high emissions of SO₂ and NO_x from the Gadsden electric generating unit and high PM_{2.5} pollution concentrations, should be included in the nonattainment area.

In this letter, we have provided a few examples of surrounding counties that contribute to nonattainment in a nearby C/MSA and should be included in the nonattainment area. These examples are only illustrative. There are many more counties near C/MSAs that contribute to nonattainment and must be included within the designated nonattainment boundary. We strongly recommend that EPA conduct a thorough review of the counties adjacent to C/MSAs and carry out its responsibility under the Clean Air Act to in fact designate as nonattainment those nearby counties that contribute to unhealthy particulate pollution concentrations.

Likewise, Counties Adjacent to C/MSAs With Monitored Violations Should be Designated Part of the C/MSA to Form More Comprehensive Nonattainment Areas

While in some instances nearby areas contribute to nonattainment in a downwind county and must be included as part of the C/MSA, it is also the case that there are counties adjacent to C/MSAs with monitored violations. In many instances, it is evident that sound air quality planning and management dictates that the adjacent areas with violations should be included with the C/MSA to form a more comprehensive nonattainment area. Airsheds do not neatly confine themselves to C/MSAs and where monitoring shows a violation, it is EPA's

responsibility to ensure comprehensive boundaries are established and that the violating county is not artificially split off from the nearby C/MSA.

For example, the Harrisburg-Carlisle-Lebanon CMSA and the York-Hanover-Gettysburg CMSA in Pennsylvania are adjacent to one another. The sources in both areas should be subject to the same, comprehensive particulate nonattainment planning requirements including RACT requirements. And neither area should be redesignated attainment until both areas attain. By contrast, the misplaced effect of designating adjacent counties as separate nonattainment areas will likely mean disparate design values for the C/MSAs even though they share the same airshed and are commonly affected by the same pollution sources.

EPA Must Ensure That Interstate and Intrastate Areas Have Comprehensive, Coordinated Boundaries

We also are deeply concerned by the recommendations to split up interstate and intrastate areas that are inextricably linked. For example, Maryland has recommended that its portion of the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV C/MSA be designated as a separate nonattainment area. The effect of designating the Maryland counties as a separate nonattainment area will likely mean different design values and different control measures for the Maryland area. This approach will undermine intergovernmental coordination and integrated, rational planning in addressing unhealthy particulate levels and will fail to adequately protect public health across the interstate C/MSA.

We have found numerous other examples of states requesting the splitting up of C/MSAs into separate nonattainment areas without any reasoned explanation. Additional examples of this problem are noted below.

Political considerations are not a permissible basis for excluding portions of intrastate or interstate areas from a nonattainment designation. To the contrary, it is especially important that comprehensive, coordinated nonattainment boundaries are promulgated in areas spanning multiple jurisdictions to facilitate cooperation and coordination between the various governmental entities and to expeditiously address these regions' PM_{2.5} pollution problems.

EPA Must Use The Most Recent OMB Metropolitan Boundary Lists For The Designation of Nonattainment Boundaries

In order to base these designations on the most representative data available, EPA must use the most recent (2003) OMB metropolitan boundary lists for its PM_{2.5} nonattainment boundary designations. This must be done in order to reflect current populations and the emissions resulting from those populations. Our comments in this letter are based on the 2003 OMB lists.

Designation of Attainment/Unclassifiable Areas Must Be Consistent with the Mandates of the Prevention of Significant Deterioration Program

Several states have recommended dividing the remainder of the state into numerous attainment/unclassifiable areas. This is being proposed to avoid triggering widespread applicability of the PSD increments to all growth in air emissions. EPA must keep the mandates of the PSD program in mind when acting on these PM_{2.5} attainment area requests. Designation

of small attainment areas contravenes EPA's core responsibility under the Clean Air Act to prevent significant deterioration of air quality.

The attainment/unclassifiable designation is pivotal to the prevention of significant deterioration program because "baseline areas," i.e., those areas in which the "minor source baseline date" is triggered, are tied to areas designated as attainment or unclassifiable under section 107(d)(1) of the Clean Air Act. See 40 C.F.R. §52.21(b)(15)(i). Under federal PSD regulations, minor, area, and mobile source emissions growth do not affect the PSD increment until after the minor source baseline date is triggered for an area. The baseline date is not triggered until the submittal of the first complete PSD permit application for a proposed major source or major modification of the pollutant in question, in this case PM_{2.5}, and the date is only triggered in those attainment/unclassifiable areas where the proposed source would locate or would have a significant ambient impact.

Historically, many states have requested designation of one attainment/unclassifiable area – the remainder of the state that was not nonattainment. However, as many areas have had sufficient growth in air emissions to violate, or approach violations, of the PSD increments, some states appear to believe that the best solution to these problems is to ensure that the baseline area is defined as small as possible by designating attainment/unclassifiable areas as small as possible. The State of Montana's request to designate the state's PM_{2.5} attainment areas into several thousand 10 kilometer by 10 kilometer squares is the most egregious example of this approach. The State of Wyoming has proposed city-wide and county-wide attainment designations. The State of Utah has proposed township-wide attainment areas, claiming in part to be avoiding "overly burdensome requirements in preparing a PSD permit application that have no bearing on the air quality in the region surrounding the actual project."

Utah's assertions are seriously misplaced. The PSD permitting program only requires analysis of air quality impacts in those areas where the proposed source would have an ambient impact – regardless of the size of the attainment/unclassifiable area or areas in which the source would locate or have an impact. Thus, Utah's claim is either misguided or reflects a basic misunderstanding of how consumption of the PSD increments is not uniform across an attainment area – increment consumption varies in space and time just as with concentrations that affect the NAAQS.

Further, all of the state proposals would result in subdividing the air quality of the Class I areas in these states, such that a Class I area would be subject to differing baseline dates and thus differing levels of increment consumption. It could also likely mean that the entirety of a Class I area would essentially be without the protection of the PSD increments. This is at odds with the core purposes of the PSD program including section 160(1) of the Clean Air Act that calls for the air quality in our national parks and wilderness areas to be preserved, protected and enhanced.

The attainment area designations proposed by these states will essentially mean that large portions of these states will be without the protection of the PSD increments. Thus, in these portions of the states, there will be no meaningful standards in place to ensure that air quality does not degrade to the level of the NAAQS. Yet, section 161 of the Clean Air Act mandates that each SIP shall contain emission limitations and such other measures as may be necessary to prevent significant deterioration of air quality in each region (or portion thereof) designated pursuant to section 107 as attainment or unclassifiable. Simply put, the state recommendations

to make the unclassifiable/attainment designations small checkerboard areas flies in the face of the PSD program, its core purposes, and basic tenets of reasoned decision-making. These seriously flawed recommendations must be rejected.

SPECIFIC COMMENTS ON DEFICIENCIES IN THE STATES' RECOMMENDATIONS

The discussion below examines some of the specific problems with the states' recommended air quality designations for PM_{2.5}. It is incumbent upon EPA to ensure that the final air quality designations for PM_{2.5} are protective and comprehensive, as required by the manifest terms of the statute and EPA's interpretive policies, and are consistently and rationally implemented for all areas across the country. See *Western States Petroleum Association v. EPA*, 87 F.3d 280, 285 (9th Cir. 1996) ("We need not defer to the EPA because the EPA has abused its discretion in departing from its own prior standards. Because the EPA has failed to offer a sufficient explanation for its differential treatment of Washington's Title V program, we reverse EPA's decision on Washington's ... rules.") (citations omitted). Failure to do so will compromise bedrock public health protections and lead to arbitrary agency action.

Alabama:

- Alabama recommended Jefferson County (part of Birmingham-Hoover-Cullman, AL CMSA) and Russell County (part of Columbus-Auburn-Opelika, GA-AL CMSA) for nonattainment areas.
- *Birmingham-Hoover-Cullman CMSA* - The entire CMSA must be designated nonattainment because the entire area is part of one urban area, and due to the high expected growth rates and high emissions from point sources in some of the other CMSA counties. In addition, the Gadsden MSA should also be added to this nonattainment area due to the high emissions in Etowah County that add to the high PM_{2.5} in the CMSA and the high air quality monitoring data.
 - Most other counties in the CMSA (Bibb, Blount, Chilton, Cullman, and St. Clair Counties) do not have monitors.
 - Shelby County had a 3-year average of 14.4 µg/m³ with incomplete data during 2003 (14.9 average for 2003).
 - Walker County only had an operational monitor for one year, but the monitoring data was not provided in state's letter.
 - According to the State's letter Bibb, Blount, Chilton, Cullman, St. Clair and Shelby Counties all had more population growth between 1993 and 2002 than did Jefferson County and all these counties are expected to have more population growth between 2002 and 2025 than Jefferson (expected growth ranges from 14% to 42% compared to Jefferson County's 2.8%).
 - Shelby County has one electric generating unit (EGU) and at least 7 non-EGUs. According to the State's letter, total NO_x emissions from point sources are 33,942 tons per year, while SO₂ emissions total 106,405 tons per year.
 - Walker County has one EGU (Gorgas) with five units and point source NO_x emissions total 29,378 tons per year while SO₂ totals are 97,851 tons per year.²

² EPA, Acid Rain Database, "2002 Unit Level Emissions."

One of the units at the power plant has SCR and none of the units have scrubbers.³

- Etowah County, just outside of the Birmingham-Hoover-Cullman CMSA (in the Gadsden MSA), is home to the Gadsden power plant. According to the acid rain database, 2002 SO₂ emissions were 8,741 tons per year and NO_x emissions were 1,918 tons per year.⁴ This plant does not have scrubbers or SCR.⁵ Monitoring data shows a three-year annual average of 14.8 with incomplete data for 2001 (15.3 average) and 2002 (14.8 average).
- *Columbus-Auburn-Opelika, GA-AL CMSA* - The entire CMSA must be designated nonattainment because the entire area is part of one urban area, high expected growth rates and high emissions from point sources in some of the other CMSA counties. In addition, EPA must thoroughly consider including the neighboring Montgomery MSA in the same nonattainment area due to its high emissions and potential impact air quality in the Columbus CMSA.
 - The CMSA includes Russell, Lee and Macon in Alabama and Chattahoochee, Harris, Marion and Muscogee Counties in Georgia, (Georgia did not recommend these counties for nonattainment).
 - Lee and Macon Counties do not have monitors.
 - Lee County contributes the majority of VOC and NH₃ in the CMSA and has more vehicle miles traveled (VMT) than other counties.
 - The Montgomery MSA (Montgomery, Autauga, Elmore and Lowndes Counties) is a source of high emissions that may negatively impact the Columbus CMSA. Serious consideration should be given to including this MSA in the nonattainment area.
- *Atlanta-Sandy Springs-Gainesville, GA-AL CMSA*- The entire CMSA must be designated as one nonattainment area. As this CMSA is adjacent to the violating Columbus-Auburn-Opelika, GA-AL CMSA, EPA should also consider making both of these areas part of a single, comprehensive nonattainment area.
 - A few counties in Georgia were recommended by the State for nonattainment.
 - Chambers County is included in the CMSA and must be designated nonattainment as a portion of this larger area.

California:

- California recommended four nonattainment areas – South Coast Air Basin, San Joaquin Valley Air Basin, San Diego County (consistent with MSA), and the City of Calexico (although the State says that preliminary 2001-2003 data indicates that Calexico may attain standard).
- *Imperial County* – The entire county must be designated nonattainment.
- *South Coast Air Basin – Part of the Los Angeles-Long Beach-Riverside CMSA* – The State has recommended only a portion of this area be nonattainment, but the entire CMSA should be designated nonattainment.

³ EPA, Clean Air Markets, National Electric Energy Data System, “Attachment F, Emission Controls on Existing Units in v.2.1.6,” www.epa.gov/airmarkets/epa-ipm/attachment-f.pdf.

⁴ EPA, Acid Rain Database.

⁵ EPA, Clean Air Markets.

- California recommended that only parts of Los Angeles, San Bernardino and Riverside Counties be included in the nonattainment area without explanation. The CMSA also includes Ventura County, which must be part of the nonattainment area. Ventura County has high emissions of PM, NO_x and VOC.
- *San Joaquin Valley Air Basin includes Bakersfield MSA, Fresno-Madera CMSA, Merced MSA, Modesto MSA, Stockton MSA, and Visalia-Porterville MSA.*
 - State's recommendation includes all counties in the C/MSAs except eastern Kern County. The state's recommendation is misplaced. All three monitors in Kern County are violating both the 24-hour and annual standards. The state has provided no compelling basis for truncating the county.
 - In addition, Alameda, Contra Costa, Monterey, Sacramento, San Luis Obispo, Santa Barbara, and Santa Clara Counties, adjacent to this area, have high emissions of PM, SO₂, NO_x, and VOC and should be considered for inclusion in the nonattainment area.

Connecticut:

- The State recommended that the entire state be designated as attainment based on 2000-2002 data.
- *New York-Newark-Bridgeport, NY-NJ-CT-PA CMSA*- The entire CMSA, including Litchfield, Fairfield and New Haven Counties in Connecticut, must be designated nonattainment.
 - The State misses the mark in arguing that the violating monitor in New Haven (16.6 average for 2000-02) is not a basis for a nonattainment designation. The State maintains that the monitor is microscale and more influenced by traffic entering the nearby interstate. Despite the State's argument, New Haven County has rather high emissions of several pollutants (3,170 for PM_{2.5}, 17,771 for SO₂, 31,345 for NO_x and 31,855 for VOC).
 - The Bridgeport Harbor power plant is located in Fairfield County. In 2002, this plant emitted 4,091 tons per year of SO₂ and 1,736 tons per year of NO_x. The plant does not have scrubbers or SCR. In total, Fairfield County has high emissions of several pollutants (3,154 tons per year of PM_{2.5}, 20,031 tons per year of SO₂, 36,762 tons per year of NO_x and 33,490 tons per year of VOC). Therefore, the county's inclusion in the nonattainment area is important for the protection of air quality in the area.

Delaware:

- All areas were recommended as attainment based on 2000-2002 data except New Castle County.
- *Philadelphia-Camden-Vineland, PA-NJ-DE-MD CMSA* – The entire CMSA must be designated as one nonattainment area.
 - Delaware believes that the nonattainment area should be limited to New Castle County and not the entire CMSA (the CMSA includes the following counties - New Castle, DE, Cecil, MD, Salem, NJ, Burlington, NJ, Camden, NJ, Gloucester, NJ, Cumberland, NJ and Bucks, Chester, DE, Montgomery and Philadelphia, PA). And Delaware asserts that New Castle County should be a separate nonattainment area. But New Castle is properly part of the Philadelphia CMSA. Not only are there interlocking traffic and commuting patterns, but the Edgemoor

power plant in New Castle County, which emitted 10,528 tons of SO₂ per year and 3,307 tons of NO_x per year in 2002 (according to EPA's Acid Rain Database), has impacts beyond the confines of New Castle County.

Georgia:

- Georgia recommended attainment for all areas, except 10 counties (Bibb, Clarke, Clayton, Cobb, DeKalb, Floyd, Fulton, Habersham, Richmond, and Walker).
- *Columbus-Auburn-Opelika, GA-AL CMSA* – The entire CMSA must be designated nonattainment.
 - Alabama has recommended nonattainment for Russell County due to monitored violations. Chattahoochee, Harris, Marion, and Muscogee Counties in Georgia must be included in the nonattainment area.
 - Troup County, Georgia has high emissions of NO_x and VOC⁶ that and should be considered for its contribution to the nonattainment area.
- *Chattanooga-Cleveland-Athens, TN-GA CMSA* –The entire CMSA must be designated nonattainment.
 - Walker County, recommended by the State for nonattainment, is part of this CMSA. The CMSA also includes Catoosa and Dade Counties, GA, and Hamilton, Marion, Sequatchie, McMinn, Bradley, and Polk Counties, TN.
- *Augusta-Richmond County, GA-SC MSA* – The entire CMSA must be designated nonattainment.
 - Georgia recommended Richmond County for nonattainment based on monitored violations. This MSA includes Burke, Columbia, McDuffie, and Richmond Counties, GA and Aiken and Edgefield Counties, SC. South Carolina did not recommend a nonattainment designation for its counties within this MSA.
- *Macon-Warner Robins-Fort Valley CMSA* – The entire CMSA must be designated nonattainment.
 - Bibb County is part of this CMSA that includes Bibb, Crawford, Jones, Monroe, Peach, Houston and Twiggs Counties.
 - Putnam County, directly north of the CMSA, is home to the Harllee Branch power plant that released about 74,000 tons of SO₂ and almost 30,000 tons of NO_x in 2002.⁷ This facility has no scrubbers or SCR at any of its units.⁸
- *Athens-Clarke County, GA MSA* – The entire CMSA must be designated nonattainment.
 - Clarke County is part of this MSA that includes Clarke, Madison, Oconee and Oglethorpe Counties.
- *Atlanta-Sandy Springs-Marietta, GA-AL CMSA* - The entire CMSA must be designated nonattainment.
 - Clayton, Cobb, DeKalb & Fulton Counties were recommended by the State as nonattainment, but the CMSA includes 28 counties.
 - Floyd County, near the CMSA, should also be considered for inclusion in the nonattainment area. The Hammond electric generating unit, located in Floyd County, discharged over 26,000 tons of SO₂ and over 8,000 tons of NO_x in 2002.⁹

⁶ EPA, OAQPS, "PM_{2.5} Designations – Potential Nonattainment Areas and Factors for Consideration," May 21, 2004.

⁷ Ibid.

⁸ EPA, Clean Air Markets.

⁹ EPA, Acid Rain Database.

- Troup County, Georgia has high emissions of NO_x and VOC¹⁰ that should be considered for its contribution to the nonattainment area.

Illinois:

- *Chicago-Naperville-Michigan City, IL-IN-WI CMSA* - The entire CMSA must be designated nonattainment.
 - The State only proposed parts of the CMSA for nonattainment (Cook, DuPage, Kane, Lake, Will and McHenry Counties, as well as Oswega, Aux and Goose Townships), but DeKalb and Kankakee Counties and parts of Kendall and Grundy Counties were not included.
 - LaSalle County, just outside of the CMSA has high emissions of PM, NO_x, and VOC and should be considered for inclusion in the nonattainment area.
 - The nearby Rockford MSA should also be considered for its impacts to the nonattainment area due to high NO_x and VOC emissions in Winnebago County.
- *St. Louis-St. Charles-Farmington, MO-IL CMSA (Metro-East)* -The entire CMSA must be designated nonattainment.
 - The State recommended Madison, Monroe and St. Clair counties for nonattainment.
 - Calhoun, Macoupin and Bond Counties are included in the 2003 OMB lists in the MSA, but are not included in the recommended nonattainment area.
 - Jersey and Clinton Counties are in the CMSA, but are not recommended for nonattainment.
 - Randolph County is just outside of this CMSA, but may be a contributor to the nonattainment problem due to the large power plant (Baldwin) in the county. The State's letter recommends consideration of the Baldwin township for nonattainment due to the plant, but recommends that the county be designated unclassifiable in the end due to anticipated emission reduction requirements for the plant. EPA should thoroughly consider including this county within the nonattainment boundaries. The SO₂ emissions from this plant were 26,267 tons per year while NO_x emissions were 22,374 tons per year.

Indiana:

- *Chicago-Naperville-Michigan City, IL-IN-WI CMSA* - The entire CMSA must be designated nonattainment.
 - Jasper, LaPorte, Lake, Newton and Porter Counties included in CMSA, but only Lake County recommended for nonattainment by the State
 - St. Joseph County, adjacent to the CMSA, should be included in the nonattainment area due to its high emissions of PM, NO_x, and VOC.¹¹
- *Louisville-Elizabethtown-Scottsburg, KY-IN CMSA* - The entire CMSA must be designated nonattainment.

¹⁰ EPA, OAQPS, "PM2.5 Designations – Potential Nonattainment Areas and Factors for Consideration," May 21, 2004.

¹¹ EPA, OAQPS spreadsheet.

- Indiana recommended Clark County for nonattainment, but the other Indiana counties in CMSA that are not included are Washington, Scott, Floyd, and Harrison Counties.
 - The Floyd County monitoring data shows that this area has high concentrations; the 2001-03 annual average was 14.9, and the 2000-02 was 15.5 with incomplete data. In its submittal, Indiana explained that Floyd County, along with Clark, contributes most of emissions in the area. Indeed, the total 2001 emissions in tons per year were 3,826 for PM, 47,796 for SO₂, 10,282 for NO_x and 4,789 for VOC. And, according to the acid rain database, the R. Gallagher Station in Floyd County emitted 47,768 tons per year SO₂ and 6,132 NO_x tons per year in 2002. The four units at this power plant have no scrubbers or SCR.¹²
 - Jefferson County, adjacent to this CMSA, should also be included in the nonattainment area. According to EPA, Jefferson County, IN has high emissions of SO₂ and NO_x (39,599 and 33,990 tons per year respectively). The vast majority of these emissions are due to the Clifty Creek electric generating facility located in the county.¹³ While this facility has SCR at five out of its six units, none of the units have scrubbers.¹⁴
- *Indianapolis-Anderson-Columbus CMSA* - The entire CMSA must be designated nonattainment.
 - Marion County recommended for nonattainment by the State, but the 14 other counties in the CMSA are not included.
 - Morgan and Hamilton Counties, also included in the CMSA, both have power plants, neither of which have SCR or scrubbers on any of their units.¹⁵
 - Tippecanoe County, near the Indianapolis CMSA, has had high pollution concentrations. According to the State's submittal, one monitor had a 15.4 average for 2000-02 with incomplete data, but the monitor was moved after this time. Another monitor had a 15.2 average for 2000-02 and 14.7 for 2001-03. Tippecanoe County's 2001 annual emissions were over 4,000 tons of PM, over 11,000 tons of SO₂, almost 10,000 tons of NO_x and almost 15,000 tons of VOC.¹⁶ This county is in the Lafayette MSA with Benton and Carroll Counties. EPA should consider including this area in the larger Indianapolis CMSA nonattainment area.
 - *Evansville, IN-KY MSA* – The entire MSA must be designated nonattainment.
 - The State recommended Vanderburgh County for nonattainment, but three other Indiana counties and two counties in Kentucky (all part of the MSA) were not recommended for nonattainment.
 - There are several high-polluting power plants in these counties (A B Brown, F B Culley, Gibson and Warrick in Indiana and Henderson 1, HMP&L Station 2, R D Green and Robert Reid in Kentucky).

¹² EPA, Clean Air Markets.

¹³ EPA, Acid Rain Database.

¹⁴ EPA, Clean Air Markets.

¹⁵ EPA, Clean Air Markets.

¹⁶ EPA, OAQPS spreadsheet.

- In addition to the power plants located inside the MSA, there are a number of power plants located in counties near the MSA. These power plants include Edwardsport in Knox County, Frank E Ratts and Petersburg in Pike County and Rockport in Spencer County. The emissions from these power plants outside the MSA may also be important for attainment of the PM_{2.5} standard within the MSA.
- Dubois County, also outside of the MSA, was recommended by the State as a separate nonattainment area. Due to the nearness of these two areas, EPA should consider including the Dubois County nonattainment area as part of the larger Evansville nonattainment area.
- *Cincinnati-Middletown-Wilmington, OH-KY-IN CMSA* - The entire CMSA must be designated nonattainment.
 - Dearborn, Franklin and Ohio Counties in Indiana were not recommended by the State for nonattainment while other parts of CMSA in Ohio were recommended for nonattainment.
 - Dearborn County is home to the Tanners Creek power plant, which has no scrubbers or SCR¹⁷ and emitted 62,533 tons per year of SO₂ in 2002 and 17,534 tons per year of NO_x.¹⁸

Kentucky:

- The State recommended that Jefferson and Fayette Counties be designated nonattainment and recommended a deferred designation for Boyd County.
- *Lexington-Fayette—Frankfort—Richmond CMSA* - The entire CMSA must be designated nonattainment.
 - Fayette County is part of the CMSA that includes 12 other counties not recommended for nonattainment by Kentucky.
 - Other counties in the CMSA besides Fayette County do have emissions (including emissions from the Dale power plant in Clark County), which contribute to nonattainment.
 - In addition to the emissions within the CMSA, the E.W. Brown power plant in Mercer County, adjoining to the CMSA, is a large source of emissions. In 2002, this facility emitted 46,606 tons per year of SO₂ and 7,925 tons per year of NO_x. The Cooper electric generating facility is located in Pulaski County. This facility emitted over 22,000 tons of SO₂ and almost 5,000 tons of NO_x in 2002.¹⁹ These power plants are significant sources of emissions that may be adversely impacting the Lexington CMSA. Therefore, Mercer and Pulaski Counties should be included in the nonattainment area as well.
- *Louisville-Elizabethtown-Scottsburg, KY-IN CMSA* - The entire CMSA must be designated nonattainment.
 - Kentucky recommended that Jefferson County be designated nonattainment. This county is part of the Louisville CMSA that consists of 11 other counties in Kentucky and five counties in Indiana.

¹⁷ EPA, Clean Air Markets.

¹⁸ EPA, Acid Rain Database.

¹⁹ EPA, Acid Rain Database.

- The Bullitt County monitoring data showed high pollution concentrations for 2001-03 at 14.9, according to the State. There are no monitors located within the other counties in the Kentucky portion of the CMSA.
- Carroll County, adjacent to both the Cincinnati CMSA and the Louisville CMSA, is home to the Ghent electric generating facility that produced over 46,000 of SO₂, over 19,000 tons of NO_x in 2002.²⁰ EPA should conduct analysis to determine in which CMSA Carroll County should be included.
- *Huntington-Ashland, WV-KY-OH MSA* (includes Boyd and Greenup Counties in Kentucky) - The entire MSA must be designated nonattainment.
 - One county in this MSA in both West Virginia and Ohio are violating.
 - Boyd County's monitored three-year annual average for 2001-03 was 15.0, the average was 15.7 for 2000-02 and 15.5 for 1999-01.²¹
 - The State reported that Boyd County produces the majority of emissions of all pollutants in the Kentucky portion of the MSA.
 - Lawrence County, adjacent to the MSA, is home to the Big Sandy electric generating facility. This facility emitted almost 42,000 tons of SO₂ and over 15,000 ton of NO_x in 2002. This County should be included in the nonattainment area.
- *Evansville, IN-KY MSA* – The entire MSA must be designated nonattainment.
 - Indiana recommended that Vanderburgh County, IN be designated nonattainment, but three other Indiana counties and Henderson and Webster Counties in Kentucky were not recommended for nonattainment.
 - Within the MSA, the R.D. Green and Robert Reid facilities in Webster County and the Elmer Smith power plant in Daviess County, adjacent to the MSA, should be considered as factors in the area's nonattainment problem.²² Due to the nearness of Daviess County to the MSA and the emissions from its power plant, it should also be included in the nonattainment area.
- *Cincinnati-Middletown-Wilmington, OH-KY-IN CMSA* - The entire CMSA must be designated nonattainment.
 - The Hamilton and Butler County, OH monitors are violating the annual PM_{2.5} standard.
 - The Kentucky counties in the CMSA are: Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton.
 - The only Kentucky Counties in the CMSA with monitors are Campbell and Kenton Counties. Monitoring data for these areas shows high pollution concentrations. Campbell County's 2001-03 design value was 14.5, but the design value was 15.3 for 2000-02 and 15.5 for 1999-2001. Kenton County's design values were 15.0 for 2001-03, 15.7 for 2000-02 and 15.9 for 1999-2001.
 - The East Bend power plant is located in Boone County, within the CMSA.

²⁰ EPA, Acid Rain Database.

²¹ EPA, OAQPS, "PM_{2.5} Designations – Potential Nonattainment Areas and Factors for Consideration," May 21, 2004.

²² EPA, Acid Rain Database.

- Carroll County, adjacent to both the Cincinnati CMSA and the Louisville CMSA, is home to the Ghent electric generating facility that produced over 46,000 of SO₂, over 19,000 tons of NO_x in 2002.²³ An analysis must be done to determine in which CMSA Carroll County and its contributions should be included.
- In addition, the H.L. Spurlock power plant is located in Mason County. This facility emitted over 40,000 tons of SO₂ and over 8,000 tons of NO_x in 2002.²⁴ Due to facility's likely contributions to the particulate nonattainment problem within the CMSA, Mason County should be included in the nonattainment area.

Maryland:

- The State recommended the Washington DC Area, the Baltimore Area, Queen Anne's County, Cecil County, and Washington County for nonattainment.
- *Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CMSA* - The entire CMSA must be designated as one nonattainment area and not split into separate nonattainment areas.
 - Frederick, Montgomery, Prince George's, Calvert and Charles Counties were recommended as one nonattainment area by the District of Columbia.
 - This CMSA includes the Baltimore-Towson MSA (Anne Arundel, Baltimore, Carroll, Harford, Howard and Queen Anne's Counties, and Baltimore City). Maryland recommended this MSA as a separate nonattainment area from that of the larger CMSA.
 - The Lexington Park, MD Micropolitan Statistical Area, consisting of St. Mary's County, is also included in the CMSA, but not recommended for nonattainment by the State.
- *Hagerstown-Martinsburg, MD-WV MSA* - The entire MSA must be designated nonattainment.
 - Maryland recommended that Washington County be designated nonattainment. Berkeley and Morgan Counties in West Virginia need to be included in this nonattainment area.
 - Alleghany County may also be a significant source of emissions impacting the nonattainment problem and should be considered for inclusion in the nonattainment area. In 2001, the county emitted over 3,000 tons of PM, over 20,000 tons of SO₂ and over 12,000 tons of NO_x.²⁵
- *Philadelphia-Camden-Vineland, PA-NJ-DE-MD CMSA* - The entire CMSA must be designated nonattainment.
 - Maryland recommended nonattainment for Cecil County, Delaware did not recommend its portion of this CMSA for nonattainment.

Michigan:

- The State recommended nonattainment for Wayne and Monroe Counties.
- *Detroit-Warren-Flint CMSA* - The entire CMSA must be designated nonattainment.

²³ EPA, Acid Rain Database.

²⁴ Ibid.

²⁵ EPA, OAQPS spreadsheet.

- The CMSA includes Wayne County and Lapeer, Livingston, Macomb, Oakland, St. Clair, Washtenaw, Genesee, and Monroe Counties.
- This CMSA is home to several electric generating facilities, including, Belle River, St. Clair and Marysville in St. Clair County, Conners Creek, Trenton Channel, Wyandotte and River Rouge in Wayne County, J R Whiting and Monroe in Monroe County.²⁶ Due to the number of large sources in this area, it is important that the nonattainment designation cover the entire CMSA in order to protect public health.
- Ingham County in the Lansing-East Lansing-Owosso CMSA has rather high emissions, which may be partially due to the Eckert Station power plant. This county should be analyzed for inclusion in the nonattainment area.

Missouri:

- The State recommended Jefferson, Franklin, St. Charles and St. Louis Counties and St. Louis City for nonattainment.
- *St. Louis-St. Charles-Farmington, MO-IL CMSA* - The entire CMSA must be designated nonattainment.
 - Farmington, Lincoln, Warren, Washington Counties and Sullivan City (in Crawford County) are not included in the recommended nonattainment area.
 - According to the state, Crawford and Washington Counties are expected to experience high growth rates in next 20 years.
 - According to the state, neighboring Ste. Genevieve County has had several permit applications submitted for large NO_x sources to locate in this county (adding 9,000 tpy NO_x).
 - Iron County should also be considered for its contribution to the neighboring nonattainment area. SO₂ emissions were high in this county in 2001.²⁷

Montana:

- Montana recommended that part of Lincoln County (Libby area) be designated nonattainment.
- The entire county should be designated nonattainment.

New Jersey:

- New Jersey recommended a nonattainment designation for portions of the New York-Newark-Bridgeport, NY-NJ-CT-PA CMSA
- *New York-Newark-Bridgeport, NY-NJ-CT-PA CMSA* – This entire CMSA must be included as one nonattainment area. New York-Newark-Edison NY-NJ-PA MSA
 - New Jersey has not recommended that Ocean and Sussex Counties, part of this CMSA, be designated nonattainment.
- *Philadelphia-Camden-Vineland, PA-NJ-DE-MD CMSA* - The entire CMSA must be designated nonattainment.
 - New Jersey has not recommended nonattainment for its portion of this CMSA because it erroneously claims that the monitors show that it does not contribute to

²⁶ EPA, Clean Air Markets.

²⁷ EPA, OAQPS spreadsheet.

PM_{2.5} levels in Philadelphia. There is no reasoned basis for this claim. Parts of this CMSA in other states are violating.

New York:

- *New York-Newark-Bridgeport, NY-NJ-CT-PA CMSA* – This entire CMSA must be designated as one nonattainment area.
 - New York did not include Putnam, Rockland, Westchester, Nassau, Suffolk, Dutchess, Orange and Ulster Counties in the nonattainment recommendation. The Lovett power plant in Rockland County has no SCR or scrubbers and emitted 7,979 tons per year of SO₂ and 3,487 tons per year of NO_x during 2002.

North Carolina:

- North Carolina recommended that Davidson and Catawba Counties be designated nonattainment.
- *Greensboro-Winston-Salem-High Point CMSA*
 - North Carolina recommended a nonattainment designation for Davidson County but not the remainder of the CMSA (Surry, Guilford, Randolph, Rockingham, Davie, Forsyth, Stokes, and Yadkin Counties).
 - The Dan River power plant is located in Rockingham County and is a significant source of emissions in the area.
 - Chatham County, in the Raleigh-Durham-Cary CMSA, is home to the Cape Fear power plant. In 2002, this facility emitted almost 12,000 tons of SO₂ and over 2,000 tons of NO_x. This CMSA should be seriously evaluated for its contribution to the nonattainment problem in the neighboring CMSA.
 - Rowan County, in the Charlotte-Gastonia-Salisbury, NC-SC CMSA, is home to the Buck electric generating facility. The emissions from this facility should be evaluated as to their impact on the nearby nonattainment area.
- *Hickory-Morgantown-Lenoir NC MSA*
 - The State recommended nonattainment for a portion of Catawba County and did not include the rest of the nonattainment area, which includes Alexander, Burke, and Caldwell Counties.
 - The nearby Rutherford County may also need to be included in the nonattainment area due to its high emissions of SO₂ and NO_x.²⁸

Ohio:

- The State included two options in its recommendations. One option is to only designate those areas with violations (Cuyahoga, Portage, Summit, Trubull, Mahoning, Stark, Lucas, Franklin, Montgomery, Clark, Hamilton, Butler, Jefferson, Lawrence and Scioto Counties) or the following:

²⁸ EPA, OAQPS spreadsheet.

- *Canton-Massillon MSA* – The entire MSA must be designated nonattainment.
 - The MSA includes Stark and Carroll Counties.
 - This MSA is adjacent to the Cleveland-Akron-Elyria CMSA, the Youngstown-Warren-East Liverpool, OH-PA CMSA and the Weirton-Steubenville OH-WV MSA. All of these C/MSAs should be analyzed for their joint contributions to nonattainment.
- *Cincinnati-Middletown-Wilmington, OH-KY-IN CMSA* – The entire CMSA must be designated nonattainment.
 - The interstate CMSA includes Butler, Warren, Hamilton, Clermont, Clinton and Brown Counties in Ohio, Ohio, Boone, Campbell, Grant, Gallatin and Pendleton Counties in Kentucky and Dearborn County in Indiana.
- *Cleveland-Akron-Elyria, OH CMSA*– The entire CMSA must be designated nonattainment.
 - The CMSA includes Lorain, Medina, Cuyahoga, Summit, Lake, Portage, Geauga and Ashtabula Counties.
 - The Ashtabula power plant in Ashtabula County emitted 8,457 tons of SO₂ and 2,945 tons of NO_x in 2002.
 - The nearby Wayne County should be included in the nonattainment area due to its high emissions of SO₂, NO_x and VOC.²⁹
 - Erie, Pennsylvania had high emissions of PM, SO₂, NO_x and VOC in 2001³⁰ and should be included in the nonattainment area as well.
- *Columbus-Marion-Chillicothe CMSA* - The entire CMSA must be designated nonattainment.
 - The CMSA includes Franklin, Delaware, Licking, Fairfield, Pickaway, Ross, Morrow, Union, Marion, Hamilton, Jefferson, Fayette and Madison Counties.
 - The Pickaway electric generating station in Pickaway County emitted over 10,000 tons of SO₂ in 2002.
 - Ross, Marion, Hamilton, Jefferson, Fayette not included in the state’s recommendation. The presence of electric generating stations in these counties shows the importance of including the entire CMSA as a nonattainment area. These facilities include, Cardinal, Toronto and W H Sammis in Jefferson County, and Miami Fort in Hamilton County.
 - Coshocton County, adjacent to the Columbus CMSA, is home to the Conesville electric generating facility. In 2002 this facility emitted over 135,000 tons of SO₂ and almost 27,000 tons of NO_x.³¹
- *Dayton-Springfield-Greenville CMSA* - The entire CMSA must be designated nonattainment.
 - The CMSA includes Miami, Clark, Greene, Montgomery, Preble, Darke, and Champaign Counties.
- *Parkersburg-Marietta, WV-OH MSA* - The entire MSA must be designated nonattainment.

²⁹ EPA, OAQPS spreadsheet.

³⁰ Ibid.

³¹ EPA, Acid Rain Database.

- The interstate MSA includes Washington County in Ohio and Pleasants, Wirt and Wood Counties in West Virginia. West Virginia recommended a nonattainment designation for Wood County.
- Ohio EPA is recommending exclusion of Washington County, but emissions in this county are quite high for several pollutants. In 2001 annual emissions were 10,743 for PM_{2.5}, 173,312 for SO₂, 5,274 for VOC, and 37,020 for NO_x.³²
- *Weirton-Steubenville OH-WV MSA* - This MSA needs to be designated as one nonattainment area
 - The interstate MSA includes Jefferson County in Ohio and Hancock and Brooke Counties in West Virginia.
- *Toledo-Fremont CMSA* - The entire CMSA must be designated nonattainment.
 - The CMSA includes Lucas, Wood, Fulton, Ottawa and Sandusky Counties.
- *Youngstown-Warren-East Liverpool, OH-PA CMSA* - The entire CMSA must be designated nonattainment.
 - The CMSA includes Trumbull, Mahoning, Columbiana and Mercer (PA) Counties
- *Wheeling MSA* - The entire MSA must be designated nonattainment.
 - The interstate MSA includes Belmont County in Ohio and Ohio and Marshall Counties in West Virginia.
 - In Belmont County, SO₂ emissions alone are around 50,000 tpy, mostly due to the R.E. Burger electric generating facility. In 2002 the facility emitted over 35,000 tpy of SO₂.³³

Pennsylvania:

- *Harrisburg-Carlisle-Lebanon CMSA*- The entire CMSA must be designated nonattainment. This CMSA is adjacent to the York CMSA and should be considered for inclusion in one larger nonattainment area.
- *York-Hanover-Gettysburg CMSA* – The entire CMSA must be included as one nonattainment area. This CMSA is adjacent to the Harrisburg CMSA and should be considered for inclusion in one larger nonattainment area.
- *New York-Newark-Bridgeport, NY-NJ-CT-PA CMSA*. The entire CMSA must be included as one nonattainment area.
- *Pittsburgh-New Castle CMSA* – The entire CMSA must be included as one nonattainment area.
 - The Armstrong and Keystone electric generating facilities in Armstrong County, and the New Castle facility in Lawrence County are significant pollution sources.

³² EPA, OAQPS spreadsheet.

³³ EPA, Acid Rain Database.

- Indiana and Greene Counties just outside of the CMSA have high SO₂ emissions due to the Seward, Conemaugh and Hatfield's Ferry electric generating facilities.³⁴
- Monongalia and Preston Counties in West Virginia should be analyzed for their impacts to the nonattainment area. The counties have high emissions of PM, SO₂ and NO_x due to the Albright and Fort Martin electric generating facilities.³⁵
- *Youngstown-Warren-East Liverpool, OH-PA CMSA*– The entire CMSA must be included as one nonattainment area.
 - The CMSA includes Trumbull, Mahoning, Columbiana Counties, in Ohio and Mercer County, PA.
- *Philadelphia-Camden-Vineland, PA-NJ-DE-MD CMSA* - The entire CMSA must be designated nonattainment.
 - Maryland recommended nonattainment for Cecil County, Delaware did not recommend its portion of this CMSA for nonattainment.
 - Pennsylvania recommended Bucks, Chester, Delaware, Montgomery, Philadelphia Counties for nonattainment, which includes all of Pennsylvania Counties. But Lehigh County, adjacent to both the Philadelphia CMSA and the Reading MSA (also recommended for nonattainment) had high emissions of SO₂, NO_x and VOC in 2002, which should be taken into consideration for inclusion in one of these nonattainment areas.
 - Northhampton County is home to both the Martins Creek and Portland electric generating facilities, which are significant sources of SO₂ and NO_x. This county is adjacent to both the New York CMSA and the Philadelphia CMSA. It should be determined which nonattainment area this county contributes to so that it may be added to the appropriate nonattainment area.

South Carolina:

- South Carolina recommends attainment for all areas based on 2001-2003 data.
- *Augusta-Richmond County, GA-SC MSA* – The entire CMSA must be designated nonattainment
 - Georgia recommended Richmond County for nonattainment based on monitored violations. This MSA includes Burke, Columbia, McDuffie, and Richmond Counties, GA and Aiken and Edgefield Counties, SC. The Urquhart electric generating facility, located in Aiken County, SC emitted around 5,500 tons of SO₂ during 2002.³⁶
 - Nearby Lexington County, in the Columbia MSA and Orangeburg County have high pollution rates partially due to the Cope and McMeekin electric generating facilities.³⁷

³⁴ EPA, Acid Rain Database.

³⁵ Ibid.

³⁶ Ibid.

³⁷ EPA, Acid Rain Database.

Tennessee:

- *Chattanooga-Cleveland-Athens, TN-GA CMSA* – The entire CMSA must be designated as one nonattainment area.
 - Tennessee only recommended Hamilton County as nonattainment and left out Marion, McMinn, Bradley, Polk and Sequatchie Counties. (CMSA includes Catoosa and Dade Counties, GA)
- *Knoxville-Sevierville-La Follette, TN CMSA* – The entire CMSA must be designated as one nonattainment area.
 - The State only recommended Knox and Roane Counties (but recommended as separate areas) for nonattainment and left out Campbell, Anderson, Union, Loudon, Blount, and Sevier Counties. The Bull Run electric generating facility in Anderson County is one reason that this area should be included in the nonattainment designation.
- *Kingsport-Bristol, TN-VA MSA*- The entire MSA must be designated as one nonattainment area.
 - Tennessee only recommended Sullivan County for nonattainment and left out Hawkins County. The MSA also includes Scott County, VA, which was not recommended for nonattainment either. The John Sevier electric generating facility in Hawkins County emitted 35,486 tons of SO₂ and 10,211 tons of NO_x in 2002.³⁸
 - Hamblen County should be analyzed for its impact on the nonattainment area due to its SO₂, NO_x and VOC emissions.³⁹

Virginia:

- Virginia recommended attainment for all areas based on 2001-03 data.
- *Washington-Baltimore-North Virginia, DC-MD-VA-WV CMSA* – Due to violations, the entire CMSA must be designated nonattainment.
 - The Lee Park monitor in Fairfax County had incomplete data capture for 2001 (14.3 µg/m³), while the three-year average was 13.3.
 - Winchester, VA-WV MSA and the rest of Washington-Arlington-Alexandria, DC-VA-MD-WV MSA (including DC, 9 VA counties and 6 VA cities, and Jefferson County, WV) also included in this CMSA
- *Kingsport-Bristol, TN-VA MSA*- The entire MSA must be designated as one nonattainment area.
 - Scott County is included in this MSA.
 - Russell County, adjacent to the MSA, should be included in the nonattainment area due to the emissions from the Clinch River power plant.⁴⁰

Washington, DC:

- The District of Columbia recommends that, at the least, the Washington DC-MD-VA MSA be designated nonattainment, if not the entire Washington-Baltimore-Northern

³⁸ EPA, Acid Rain Database.

³⁹ EPA, OAQPS spreadsheet.

⁴⁰ EPA, Acid Rain Database.

Virginia DC-MD-VA-WV CMSA – The entire CMSA must be designated as one nonattainment area.

West Virginia:

- *Huntington-Ashland, WV-KY-OH MSA* – This MSA must be designated as one nonattainment area.
 - Cabell and Wayne Counties were recommended by the State for nonattainment.
 - Mason County should be included in the nonattainment area due to its high emission rates of PM, SO₂ and NO_x. These emissions are largely due to the Philip Sporn power plant located in the county.⁴¹
- *Hagerstown-Martinsburg, MD-WV MSA* – This MSA must be designated as one nonattainment area.
 - This area includes Washington County, MD and Berkeley and Morgan Counties, WV. Washington County was recommended for nonattainment.
- *Washington-Baltimore-Northern Virginia, DC-MD-VA-WV CMSA*- The entire CMSA must be designated as one nonattainment area.
 - The State recommended Jefferson and Berkeley Counties for nonattainment.
 - Hampshire County is in CMSA but was not recommended for nonattainment.
 - Grant County, near the CMSA, is home to the Mt. Storm electric generating facility. In 2002, this facility emitted over 23,000 tons of SO₂ and almost 30,000 tons of NO_x.⁴² Due to these high PM_{2.5} precursor emissions, Grant County should also be included in the nonattainment area.
- *Charleston MSA*- The entire MSA must be designated nonattainment.
 - The State may have only recommended Kanawha and Putnam Counties for nonattainment but Clay, Lincoln and Boone Counties are now in MSA as well and should be included in the nonattainment designation.
- *Parkersburg-Marietta, WV-OH MSA* - The entire MSA must be designated nonattainment.
 - State may have only recommended Wood County for nonattainment but Pleasants and Wirt Counties (and Washington County, OH) are also in MSA and should be included in the nonattainment designation. The Willow Island electric generating facility in Pleasants County emitted over 14,000 tons of SO₂ and around 6,000 tons of NO_x in 2002.⁴³
- *Weirton-Steubenville OH-WV MSA* - This MSA needs to be designated as one nonattainment area
 - The interstate MSA includes Jefferson County in Ohio and Hancock and Brooke Counties in West Virginia.
 - Ohio recommended that Jefferson County be designated nonattainment

⁴¹ EPA, Acid Rain Database.

⁴² EPA, Acid Rain Database.

⁴³ EPA, Acid Rain Database.

- West Virginia recommended that both its counties in MSA be designated nonattainment
- *Wheeling MSA* – The entire MSA must be designated nonattainment.
 - The interstate MSA includes Belmont County in Ohio and Ohio and Marshall Counties in West Virginia.
 - Ohio EPA is recommending the exclusion of Belmont County.
 - West Virginia recommended that both its counties in MSA be designated nonattainment.

Wisconsin:

- *Chicago-Naperville-Michigan City, IL-IN-WI CMSA*
 - Wisconsin has not submitted its recommendations yet, but Kenosha County is included in this CMSA and should be included in the nonattainment area.

Thank you for your consideration of our concerns.

Sincerely,

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