



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEB 16 2016

The Honorable Larry Hogan
Governor
100 State Circle
Annapolis, Maryland 21401-1925

Dear Governor Hogan:

Thank you for your recommendations dated April 19, 2011 and November 20, 2015 regarding air quality designations for the State of Maryland for the 2010 revision to the primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). Reducing levels of SO₂ pollution is an important part of the U.S. Environmental Protection Agency's (EPA) commitment to a clean, healthy environment. Exposure to SO₂ can cause a range of adverse health effects, including narrowing of the airways which can cause difficulty breathing and increased asthma symptoms. This letter is to notify you of EPA's preliminary intentions regarding your recommended designations.

On June 3, 2010, EPA strengthened the health-based or "primary" standard for SO₂ by establishing a standard for 1-hour average SO₂ concentrations at a level of 75 parts per billion. Within one year after a new or revised standard is established, the Clean Air Act requires the Governor of each state to submit to EPA a list of all areas in the state, with recommendations for whether each area meets the standard. Through an interactive process, EPA considers the recommendations and then promulgates designations for all areas across the country. On July 25, 2013, EPA designated 29 areas in 16 states as nonattainment, but did not at that time designate other areas. Pursuant to a March 2, 2015, court-ordered schedule,¹ EPA must complete the remaining SO₂ designations by three specific deadlines: July 2, 2016, December 31, 2017, and December 31, 2020.

This current round of designations, to be completed by July 2, 2016, addresses two groups of areas: (1) areas that have newly monitored violations of the 2010 SO₂ NAAQS based on the most recent three calendar years of certified monitored ambient air quality data; and (2) areas that contain any stationary source that had not been announced as of March 2, 2015 for retirement, and that according to EPA's Air Markets Database emitted in 2012 either (i) more than 16,000 tons of SO₂ or (ii) more than 2,600 tons of SO₂ with an annual average emission rate of at least 0.45 pounds of SO₂/mmBTU.

¹ *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).



After carefully considering Maryland's recommendations and other available technical information, EPA intends to designate as nonattainment the following area, which includes the following portions (p) of counties:

Area Name	County
Anne Arundel County and Baltimore County*	Anne Arundel County (p), Baltimore County (p)

Additionally, after carefully considering Maryland's recommendations and other available technical information, EPA intends to designate as unclassifiable/attainment the following area, which includes the following city:

Area Name	City
Baltimore City	Baltimore City

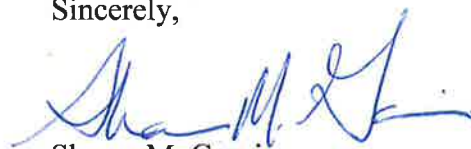
The asterisk (*) indicates the designation for this intended nonattainment area represents a modification to the designation that you have recommended.

The enclosed Technical Support Document provides a detailed analysis that supports our intended designation decisions. If your state has additional information that EPA should consider prior to finalizing these designations, please submit it to us by April 19, 2016. We also will be publishing a notice in the *Federal Register* announcing a 30-day period for the public to provide input on EPA's intended designation decisions. We will promulgate the designations for these areas by July 2, 2016. We will designate all other previously undesignated areas in the state on a schedule consistent with the prescribed timing of the court order, i.e., by December 31, 2017, or December 31, 2020.

We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO₂ standard. For additional information regarding designations under the SO₂ standard, please visit our website at www.epa.gov/so2designations.

Should you have any questions, please do not hesitate to call me, or have your staff contact Mr. Matt Colip, EPA's Maryland Liaison, at 215-814-5439.

Sincerely,



Shawn M. Garvin
Regional Administrator

Enclosure

cc: The Honorable Ben Grumbles
Secretary, Maryland Department of the Environment